

Pretreatment Compliance Inspection

Summary Report

Discharger: City of Tulare
Order No. R5-2013-0019

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Tulare, CA 93274

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Inspection Dates: January 8–9, 2014

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Contents

| | |
|---|-----------|
| 1. Executive Summary | 1 |
| 2. Introduction..... | 1 |
| 2.1 Size of Program..... | 2 |
| 2.2 Focus Topics | 3 |
| 2.2.1 SIUs in Significant Noncompliance..... | 3 |
| 2.2.2 Pharmaceuticals Management | 3 |
| 2.2.3 Streamlining | 4 |
| 2.2.4 Dental Mercury Control | 4 |
| 2.2.5 Industrial Laundries | 4 |
| 2.2.6 Performance Measures | 4 |
| 2.2.7 Nonwoven Disposable Products | 5 |
| 2.2.8 Potential Cleanups or Criminal Violations | 5 |
| 3. Pretreatment Program Modifications..... | 5 |
| 4. Local Limits..... | 6 |
| 5. Nondomestic Discharger Characterization | 6 |
| 6. Control Mechanisms..... | 7 |
| 6.1 Effluent Limits | 7 |
| 6.2 Sampling Location | 8 |
| 6.3 Permit Issuance and Effective Date | 8 |
| 6.4 Reference to SUO | 9 |
| 6.5 Permit Transfer | 9 |
| 7. Application of Pretreatment Standards and Requirements | 9 |
| 8. Compliance Monitoring | 10 |
| 8.1 Compliance Sampling..... | 10 |
| 8.2 Compliance Inspections | 12 |
| 8.3 Nondomestic Discharger Site Inspections Conducted during the Inspection | 12 |
| 8.4 Requesting, Receiving, and Analyzing Reports | 21 |
| 8.5 Slug Discharge Control Plans | 22 |
| 9. Enforcement | 23 |
| 9.1 Identifying Violations and Escalating Enforcement | 23 |
| 9.2 Violation Notification | 24 |

9.3 SNC Publication.....24

10. Summary of Requirements and Recommendations 25

10.1 Requirements25

10.2 Recommendations.....29

1. Executive Summary

This report includes several requirements and recommendations to enhance the operations of City of Tulare's (City's) pretreatment program. For instance, the City is required to identify the character and volume of pollutants contributed to the publicly owned treatment works (POTW) and apply the correct classification to significant industrial users (SIUs). The City is also required to ensure that permits are issued before they become effective and ensure that SIU are regulated via a valid control mechanism. The City is required to ensure that appropriate documentation for monitoring activities are recorded and ensure that documentation is provided for annual SIU inspection activities. The City is also required to conduct thorough inspections of process operations at the SIU facilities and ensure that industrial users are not discharging unpermitted wastes to the POTW. The City is required to ensure that industrial users are notifying the City within 24 hours of becoming aware of a violation and ensure that industrial users are collecting samples in accordance with the federal regulations at 40 CFR 136. The City is also required to ensure that industrial users are submitting reports as per their permits and ensure that slug discharge control plans contain the required elements listed in the federal regulations. Finally, the City is required to ensure that it is implementing its enforcement response plan.

In addition, several recommendations for the City are also provided. For instance, it is recommended that the City conduct sampling of hauled waste loads and that the City review potential significant noncompliance status with industrial users. It is also recommended that the City continue to develop its pharmaceutical take-back and mercury control programs and discuss the EPA's Safer Detergents Stewardship Initiative program with any industrial laundries that move into the City's service area. It is recommended that the City develop a formal line of communication with the City's collection crew and develop and distribute outreach materials in an effort to reduce the amount non-flushable materials discharged to the POTW. It is also recommended that the City review water accounts for high water usage and develop a line of communication with the Certified Unified Program Agencies (CUPA) in an effort to identify potential nondomestic dischargers. It is recommended that the City develop a checklist for performing industrial user inspections and conduct followup inspections at industrial user facilities to ensure that chemicals are properly stored, managed, and labeled. It is also recommended that the City work closely with industrial users developing pretreatment systems and making upgrades to their facilities. Finally, it is recommended that the City conduct followup inspections to confirm which drains lead to the sanitary sewer and if specific floor drains have been plugged at certain SIU facilities.

2. Introduction

On behalf of the Central Valley Regional Water Quality Control Board (Regional Water Board), PG Environmental, LLC performed a pretreatment compliance inspection (inspection) of the City of Tulare's (City's) Industrial Pretreatment Program (IPP) on January 8–9, 2014. The last inspection of the City's pretreatment program was performed in December 2011. This inspection report describes the primary concerns generated by the recent inspection.

The contracted EPA inspection team reviewed the files of four non-categorical significant industrial users (SIUs) to provide a general overview of the City's pretreatment program:

- Land O' Lakes (non-categorical SIU).
- RUAN Transportation (non-categorical SIU).
- Saputo Dairy Foods USA (non-categorical SIU).
- Tranter, Inc. (non-categorical SIU).

Site inspections were conducted at K&M Truck Repair and Paint, Land O'Lakes, RUAN Transportation, Saputo Dairy Foods USA, and Tranter, Inc. as a component of the inspection. Although the Tranter, Inc. facility was classified as a non-categorical SIU at the time of the inspection, City representatives mentioned that they were in the process of determining if the facility should be classified as a categorical industrial use (CIU). For more information on the facility's classification and other site inspections, refer to section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection.

2.1 Size of Program

City staff provided the EPA inspection team with a list of 113 nondomestic dischargers that are covered by active permits and are subject to the City's pretreatment program. The City representative stated that 13 of the dischargers have been classified as SIUs as defined at Title 40 of the *Code of Federal Regulations* (CFR) section 403.3(v). The City had not classified any of the SIUs as CIUs at the time of the inspection. The remaining 100 nondomestic dischargers consisted of non-significant industrial users including food service establishments (FSEs), bakeries, automotive shops, convenience stores, and car washes.

City staff stated that the City accepts hauled waste at the wastewater treatment plant (WWTP) in the form of sewage from within Tulare County and fats, oils, and grease (FOG) wastes from within the City of Tulare. The City issues annual permits to the waste haulers. City representatives stated that the waste haulers are allowed access to the WWTP to discharge their waste between 7:30 a.m. and 4:00 p.m. City staff guides the waste haulers to the receiving station, where they connect and discharge the hauled waste.

City representatives stated that every load of hauled waste discharged at the WWTP is sampled for pH and electrical conductivity (EC) for billing purposes. City representatives stated that if the wastewater exceeds the City's local limits for pH or EC, the City charges the waste hauler a higher disposal fee. Apart from pH and EC, the City does not conduct regular monitoring of hauled wastes for all the parameters included in the City's local limits. It is recommended that the City conduct monitoring of the hauled waste, at least randomly, in order to determine the characteristics of the hauled wastes pollutants being discharged at the WWTP.

According to the federal regulations at 40 CFR 403.8(f)(2)(ii), the City is required to identify the character and volume of pollutants contributed to the POTW by industrial users. The City representatives stated that the City accepts hauled "dirty water" from a newspaper manufacturing plant in Lindsay, CA because the local municipality will not accept the facility's dirty water. During the initial interview process, it was stated that the facility submits sampling data to the City but the City does not conduct local limits sampling for the facility's dirty water. Due to the fact that wastewater from a newspaper manufacturing facility may contain heavy metals (from inks), oil and grease, and pulp material, the wastewater from this facility should be profiled by collecting and analyzing samples of the hauled dirty water. Therefore, the City is required to profile the facility's wastewater in order to identify the character and volume of pollutants

contributed to the POTW as stated in the federal regulations at 40 CFR 403.8(f)(2)(ii). In the event that the wastewater profiling indicates that the facility's dirty water constitutes industrial strength wastewater, the City should request further information from the facility to determine if the facility needs to be regulated by an SIU permit.

2.2 Focus Topics

Before the inspection, the City was asked to complete a survey that covered the following focus topics. City representatives provided the following IPP information.

2.2.1 SIUs in Significant Noncompliance

The City's Industrial Waste Inspector and Chief Plant Operator are responsible for calculating the number of SIUs in significant noncompliance (SNC) by use of the LINKO database system.

Due to the timing of the inspection (early January), City staff had not fully calculated the number of SIUs in SNC for discharge and reporting violations for 2013 at the time of the inspection. Various lists pertaining to which of the City's SIUs were in SNC for 2013 were generated during and after the inspection. The City provided documentation to the EPA inspection team stating that the following facilities were potentially in SNC from the period of July 1, 2013 to December 31, 2013 for discharge violations:

- Nestles Dreyers Grand Ice Cream.
- K&M Truck Repair and Paint.
- RUAN Transportation.
- Kraft Foods, Inc.
- Land O' Lakes.
- Truck Tub, Inc.
- Ruiz Foods, Inc.
- Totally Tanker Interiors.

However, SNC results were available for 2012. The City stated that Rocktenn, Inc., Truck Tub, Inc., and Ruiz Foods, Inc. were in SNC for 2012. The City stated that it publishes SIUs in SNC in the *Tulare Advance-Register*. It is recommended that the City regularly review facility violations in comparison to the definitions of SNC and escalate compliance and enforcement activities to ensure compliance with industrial user permits. In addition, it is recommended that the City assess the facilities' potential SNC status and discuss such status with the industrial users.

2.2.2 Pharmaceuticals Management

City representatives stated that the City inserts flyers, written in both Spanish and English, describing the proper disposal of pharmaceuticals in utility bills on a semiannual basis. The flyers inform customers of the U.S. Drug Enforcement Administration's National Drug Take Back Day, describe what is accepted during the event, and provide the location of the unwanted pharmaceutical collection site.

It is recommended that the City continue to develop its pharmaceutical take-back program. The City could target locations such as senior care centers, hospitals, and pharmacies. Pharmaceutical waste in the publicly owned treatment works' (POTW's) effluent can have a detrimental effect

on the health of receiving waters. Pharmaceutical take-back events have proven to be a simple and effective way of reducing the harmful effects of pharmaceuticals on human health and aquatic organisms. Successful take-back programs have been implemented in California's San Francisco Bay Area by the Bay Area Pollution Prevention Group (BAPPG); EPA considers the BAPPG programs to be model systems.

2.2.3 Streamlining

The City provided information to the EPA inspection team stating that it had an agreement with Carollo Engineers, an engineering company under contract with the City, to "incorporate appropriate mandatory and optional portions of the EPA's new streamlining regulations" into the City's sewer use ordinance (SUO). A cursory review of the SUO was performed, and it appeared to contain the federally required streamlining modifications. For more information on the City's SUO, refer to section 3, Pretreatment Program Modifications, of this report.

2.2.4 Dental Mercury Control

The City does not have a formal dental mercury control program in place. City representatives stated that they were working with Carollo Engineers to compile an inventory of dental facilities within the area and to develop and distribute outreach materials about handling dental mercury to these dental facilities.

The City's daily maximum local limit for mercury is 0.013 milligrams per liter (mg/L). A cursory review of the City's waste discharge requirement (WDR) permit indicated that the City does not have a permit limit for mercury. City representatives were unsure if the measured mercury concentrations of the WWTP's influent, effluent, and sludge were increasing, decreasing, or had remained unchanged over the past five years. It is recommended that the City continue to work with its contracted engineer to develop and implement a dental mercury control program.

2.2.5 Industrial Laundries

The City did not have any industrial laundries within its service area at the time of the inspection. It is recommended that the City discuss and review the EPA's Safer Detergents Stewardship Initiative (SDSI) program with any industrial laundries that move into the City's service area. SDSI is a voluntary program to commit to the use of safer surfactants. Safer surfactants are those which break down quickly to non-polluting compounds, helping to protect aquatic life in both freshwater and salt water environments. Nonylphenol ethoxylates (NPEs) are an example of a surfactant class that does not meet the definition of a safer surfactant.

2.2.6 Performance Measures

City representatives stated that the City had implemented a FOG management program and was continuing to develop this program with the assistance of Carollo Engineers. The City is working with Carollo Engineers to permit FSEs in addition to other non-significant IUs and to develop an inspection schedule for these facilities. The City and contracted engineers have identified approximately 125 FSEs for the permitting process and intend to permit approximately six FSEs per month over the next two years.

In addition to permitting FSEs in the future, the City also plans to conduct inspections of each FSE at least once in the next two years. In addition, the City and Carollo Engineers have

developed pamphlets and flyers for distribution to the public about best management practices (BMPs) for FOG disposal. Section 7.20.495 of the City's SUO provides the City with the legal authority to implement its FOG control program. Section 7.20.495(J) of the final redline version of the City's SUO states that FSEs are required to install, operate, and maintain an approved type of grease interceptor that is adequately sized to maintain compliance with the FOG section of the ordinance.

City representatives were unsure about how many sanitary sewer overflows (SSOs) occurred in 2013 but stated that most overflow events were attributed to roots. According to City representatives, some SSOs may have been attributable to FSEs, but that was not confirmed. City representatives also stated that the sewer lines near identified "hot spot" areas are routinely cleaned once every six months.

In addition, it was stated that the City's collection crew notifies pretreatment program staff of FOG-related SSO events; however, these communications are typically informal. Upon being notified of an SSO, the pretreatment program staff may distribute information regarding proper disposal of FOG waste to the public in the area in which the SSO occurred. It is recommended that the City develop a formal line of communication with the collections crew so that FOG-related SSOs are properly referred to the pretreatment program. The pretreatment program will then be able to conduct inspections of FSEs to determine if a FOG-related SSO can be attributed to a specific FSE and then to provide outreach materials about the proper disposal of FOG waste.

2.2.7 Nonwoven Disposable Products

During the inspection, recent issues with nonwoven disposable (i.e. "flushable") wipes were discussed. City representatives stated that one pump station in particular has had a number of operational issues related to the accumulation of nonwoven disposable wipes. The City stated that in some instances, the pump stations were in need of cleaning and maintenance on a weekly basis. City representatives stated that, apart from answering questions about the cleanout from curious citizens, the City has not provided public outreach for the proper disposal of nonwoven disposable products.

It is recommended that the City develop and distribute outreach materials educating the public about the proper disposal of nonwoven disposable products in an effort to reduce non-flushable materials in the wastewater stream and ultimately to protect the City's POTW.

2.2.8 Potential Cleanups or Criminal Violations

The City was unaware of any facilities that might close and leave a cleanup needing public funding. The City has not identified any facilities that appear to have knowingly violated pretreatment or other environmental requirements.

3. Pretreatment Program Modifications

The federal pretreatment regulations at 40 CFR 403.18 require the City to notify the Regional Water Board of any modifications it intends to make to its pretreatment program. The City's SUO was last modified in November 2012 as a result of the 2011 inspection. These modifications included adding required streamlining provisions, making wording changes, and clarifying a number of definitions. It should be noted that the City modified the SUO to have the legal authority to grant EC credits to SIUs that use aqueous ammonia and changed the pH range

to 5–11 standard units (s.u.). (The previous range had been 6–11 s.u.) The SUO modifications were submitted to the Regional Water Board in 2012. Additionally, the City’s local limits and enforcement response plan (ERP) were modified in conjunction with the SUO. These modified documents were also submitted to the Regional Water Board in 2012.

4. Local Limits

The federal pretreatment regulations at 40 CFR 403.5(c) require POTWs to develop and enforce local limits to implement the general and specific prohibitions at 40 CFR 403.5(a) and (b). The pretreatment regulations also require POTWs to continue to develop these local limits as necessary and to effectively enforce the limits.

City representatives stated that the local limits were last modified in 2012. The modifications included (1) granting IUs partial EC credits for using aqua ammonia for pH adjustment, due to the fact that it does not increase the EC concentration of the facility’s discharge to the sanitary sewer, and (2) modifying the lower pH limit from 6.0 s.u. to 5.0 s.u. City representatives also mentioned that the City and its contracted engineers were in the process of determining if a local limit should be developed for sodium.

5. Nondomestic Discharger Characterization

The federal pretreatment regulations at 40 CFR 403.8(f)(2) require POTWs to develop and implement procedures to identify and locate industrial users that might be subject to the local pretreatment program. These procedures must also include proper categorization of all SIUs as defined at 40 CFR 403.3(v).

City representatives stated that the IPP receives environmental impact reports, which list new businesses that are moving into the City, from City Hall. Before a building permit can be issued to an industry by the Development Services department of the City, the facility is required to complete an application with information about its anticipated discharge volume, chemicals that will be maintained onsite, and process operations.

City representatives stated that the City’s water department has the ability to review water accounts for high volumes of usage. Additionally, the City is in contact with the City of Tulare Fire Department, which conducts annual inspections of the City’s WWTP. The City also performs drive-by inspections while en route to conduct other inspections or while collecting samples. It is recommended that City review water accounts for high usage on a quarterly basis and conduct Internet searches for existing IUs using the EPA’s Envirofacts Web site in a further effort to identify nondomestic dischargers. In addition, it is recommended that City discuss potential nondomestic dischargers with the local Certified Unified Program Agencies (CUPA) as these entities may have valuable information related to potential nondomestic dischargers.

According to the 2011 inspection report, City staff had stated no procedures were in place to identify potential nondomestic dischargers. The 2010 inspection report stated that the City had not conducted an industrial waste survey (IWS) since 2003. As a result of the 2010 inspection, the City was required to conduct an IWS to ensure that it had identified nondomestic dischargers. In response to the 2010 inspection report, City staff stated that Carollo Engineers would conduct a new IWS, which would be completed by January 2012. At the time of the 2011 inspection,

Carollo Engineers had not yet updated or conducted a new IWS. Therefore, the City was again required to develop and implement procedures to identify and locate industrial users that might be subject to the pretreatment program. In response to this requirement, the City stated, “The City, with its consultant Carollo Engineers, conducted an Industrial Waste Survey dated February 2012.”

As a component of the 2014 inspection, the EPA inspection team requested documentation for the IWS conducted in February 2012. After the inspection, City representatives provided the EPA inspection team with a document from Carollo Engineers dated March 2012. The 80-page document outlined the methods used by the contracted engineers to conduct the IWS and a list of industrial and commercial facilities identified in the City’s service area. The IWS provided by the City representative was deemed adequate.

The EPA inspection team conducted an inspection at Tranter, Inc. as a component of the 2014 inspection. At the time of the inspection, the facility was classified by the City as a non-categorical SIU. The inspection team expressed concern to the City regarding the classification of the facility due to the use of acids and caustics in the metal plate washing process that is conducted by the facility. The facility representative stated that the removal of metal from the plates by the acid and caustic washes is not the intended purpose of the washing process. However, due to the removal of metals during the metal plate washing process, the facility’s metal plate washing process is categorical and therefore regulated under 40 CFR 433, metal finishing category. The City is required to apply the correct categorical classification to the facility as required by 40 CFR 403.8(f)(2)(iii). For more information pertaining to the Tranter, Inc. facility, refer to section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection.

6. Control Mechanisms

To ensure compliance with applicable pretreatment standards, the federal pretreatment regulations at 40 CFR 403.8(f)(1)(iii) require POTWs to control the discharges from nondomestic dischargers by using control mechanisms (permits or other similar means).

6.1 Effluent Limits

The federal regulations at 40 CFR 403.8(f)(1)(B)(3) state that control mechanisms must be enforceable and contain effluent limits, based on applicable general and categorical pretreatment standards, local limits, and state and local law. The 2010 inspection report stated that the permits for two facilities, Totally Tanker Interiors and Land O’Lakes, contained mass limits for biochemical oxygen demand (BOD) and total suspended solids (TSS); however, the files had no technical basis documenting how those mass limits had been derived. Therefore, there was no way to verify that they were correct. In response, City staff stated that the draft report developed by Carollo Engineers, dated December 2, 2011, addressed the BOD and TSS limits. Carollo Engineers determined that effluent limits for BOD and TSS were not necessary for the City’s industrial users. As a result of the 2011 inspection, the City was required to revise its industrial discharger permits to contain effluent limits based on applicable local limits as stated at 40 CFR 403.8(f)(1)(B)(3). In response to this requirement, the City stated that it revised the industrial discharge permits to contain effluent limits based on applicable local limits.

As a component of the 2014 inspection, the Land O' Lakes permit was reviewed to determine if the local limits listed in the City's SUO were consistent with the local limits in the permit. The local limits listed in section 7.20.480, Specific Wastewater Limitations, of the City's SUO are consistent with the local limits listed in Part C, of the Effluent Limitations section of the permit. The Land O' Lakes permit included a surcharge table for flow, BOD, and TSS, but it did not include mass-based local limits for these parameters. From the information provided in the facility file, the Land O' Lakes effluent limits provided in the permit were consistent with the City's local limits.

6.2 *Sampling Location*

According to the 2011 inspection report, the 2010 inspection report stated that the Totally Tanker Interiors permit did not describe the sample location as required at 40 CFR 403.8(f)(1)(iii)(B)(4). As a component of the 2011 inspection, Part 1.A of the permit for Saputo was reviewed, and the descriptions of the sampling location was vague and deemed inadequate. Part 1.A of the Saputo permit described the facility's sample location as a "24 hour composite sampler enclosed in a locking structure. City maintains the key." The City was required to revise its industrial user permits to describe the sampling locations as required at 40 CFR 403.8(f)(1)(iii)(4). In response to this requirement, the City stated, "The city revised the industrial discharge permits to contain the sampling locations."

As a component of the 2014 inspection, the RUAN permit was reviewed and the facility's sampling location was described in part 1.A of the permit as "KCTL1- Located in the maintenance bay south of the first truck washing bay." From the site visit at the facility, it was confirmed that the composite sampler was located in this area of the facility. The sampling locations included in the permits reviewed as part of the 2014 inspection were deemed adequate.

6.3 *Permit Issuance and Effective Date*

According to the 2011 inspection report, as required at 40 CFR 403.8(f)(1)(iii)(B)(1), permits must contain a statement of duration, which should include an effective date and an expiration date. The effective date of the Kraft Foods, Inc. permit predated the issuance date. The Kraft Foods, Inc. permit was issued July 26, 2011, but the effective date of the permit was July 1, 2011. Therefore, the permit was issued 25 days after it had become effective. Permits should be issued before their effective dates so that permittees are aware of their limitations, obligations, and requirements before they are held responsible for upholding those permit conditions. The City was required to implement the appropriate changes to ensure that permits are issued before their effective date. In response to this requirement, the City stated that it includes "effective dates and expiration dates in the industrial discharge permits and has implemented appropriate changes to ensure that permits are issued before their effective dates."

As a component of the 2014 inspection, the permits were reviewed to determine if the appropriate modifications pertaining to the permit issuance and effective date had been completed. A review of the permits revealed that a permit effective date was not provided on the permits. The date on which the permit was signed by the wastewater superintendent was included, but this was not indicated as the effective date. Without the documentation of the permit effective date, it was unclear to the EPA inspection team if the permits had been issued before they became effective. The permits must be issued before they become effective so that permittees are aware of their responsibility in upholding permit conditions and applying with

said conditions before the permits becomes effective. The City is required to ensure that permits are issued to the facilities before they become effective.

6.4 Reference to SUO

According to the 2011 inspection report, the federal regulations at 40 CFR 403.8(f)(1)(iii) state: “POTW shall operate pursuant to legal authority enforceable in Federal, State, or local courts...and [the legal authority] shall enable the POTW to control through permit, order, or similar means, the contribution to the POTW by each industrial user.” During the file review for the 2011 inspection, inaccurate citations were noted in the Saputo permit; some citations referenced did not exist. The City’s industrial discharge permits were not accurately stating the portions of the SUO that gave the City the legal authority to implement its pretreatment program. The City was required to modify its industrial user permits to accurately reflect the specific citation of the SUO giving the City its legal authority, as stated at 40 CFR 403.8(f)(1)(iii). In response to this requirement, the City stated, “The industrial user permits have been modified to correctly reference the Sanitary Sewer Ordinance sections.”

As a component of the 2014 inspection, the RUAN Transportation permit was reviewed for consistency between the permit citations and the actual language in the SUO. Part 2, section 1.A of the RUAN Transportation permit pertains to the analysis of self-monitoring reports and contains a citation for Tulare City Code Chapter 7.20, Section 7.20.630. The final redline version of the City’s SUO was reviewed and it was determined that section 7.20.630 of the SUO refers to sewage sampling, analysis, and flow measurement. The RUAN Transportation permit contains the correct SUO citation and was deemed adequate.

6.5 Permit Transfer

According to section 7.20.780 of the final redline version of the City’s SUO, “Wastewater discharge permits are issued to a specific user for a specific operation. A wastewater discharge permit shall not be reassigned or transferred or sold to a new owner, new user, different premises, a new or changed operation or remodel of an existing facility which is retained by the current owner.” During the time of the inspection, the Saputo Dairy Foods USA facility on J Street had been previously owned by Morningstar Foods. The permit located in the Saputo Dairy Foods USA file was issued under the name of Morningstar Foods. After the inspection, City representative stated that a new permit for Saputo Dairy Foods USA had not been issued to the facility. The City is required to ensure that the Saputo Dairy Foods USA facility is covered by a permit that is specifically issued to the facility as required by section 7.20.780 of the City’s SUO.

7. Application of Pretreatment Standards and Requirements

The federal pretreatment regulations at 40 CFR 403.8(f)(1) require the City to have the legal authority to require compliance with applicable pretreatment standards and requirements and to ensure compliance with those standards and requirements through the use of control mechanisms such as permits. Permit deficiencies were identified during the January 2014 inspection; refer to Section 6, above.

According to the 2011 inspection report, the City was required to revise its legal authority to include the required streamlining provisions. The federal regulations at 40 CFR 403.8(f)(1) state that POTWs shall operate pursuant to legal authority enforceable in federal, state, or local courts. On October 13, 2005, EPA promulgated several changes to the general pretreatment regulations

(streamlining rule). The City was required to take steps to immediately modify the SUO and to implement the modifications in order to protect the POTW. The City was reminded that the federal pretreatment regulations at 40 CFR 403.18 require the City to notify the Regional Water Board of any modifications it intends to make to its pretreatment program. In response to this requirement, the City stated, “The city adopted Ordinance 12-02 on February 21, 2012, replacing Chapter 7.20 Sanitary Sewer System of the Tulare Municipal Code, incorporating all the current federal regulations.”

As a component of the 2014 inspection, the final redline version of the City’s SUO was reviewed to verify if the required streamlining modifications had been incorporated. A review of the final redline version of the SUO showed that the City had amended its SUO to include the modified definition of SNC, the requirement for reporting all monitoring results, and the requirement for slug discharge control plan requirements to be included in control mechanisms. After the cursory review of the City’s redline version of the SUO, the required streamlining changes were deemed adequate.

8. Compliance Monitoring

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(v) require a POTW to develop and implement an inspection and monitoring program to determine, independent of information supplied by nondomestic dischargers, compliance or noncompliance with applicable pretreatment standards and requirements. Furthermore, 40 CFR 403.8(f)(2)(vii) requires POTWs to investigate instances of noncompliance and to enforce the regulations as necessary.

8.1 Compliance Sampling

The regulations at 40 CFR 403.8(f)(2)(v) require SIUs to be sampled at least once each year unless the POTW has authorized a CIU to forego sampling of a pollutant regulated by the federal pretreatment requirements. In such cases, the POTW must sample for the waived pollutant(s) at least once during the permit term according to 40 CFR 403.8(f)(2)(v)(A).

City representatives stated that the City conducts compliance sampling events at its SIUs on an annual basis. In addition, the City collects pH, EC, TSS, and BOD samples from the Saputo-North, Kraft, Land O’ Lakes, Dreyers, Saputo-Lavine, Saputo-Paige, and Ruiz Foods facilities on a daily basis. It should be noted that the City utilizes its LINKO data management system to track compliance sampling data. The file review revealed that the annual compliance sampling data was not included in the City’s SIU files.

As a component of the 2014 inspection, the EPA inspection team requested the 2013 complete compliance sampling data, which was provided to the EPA inspection team after the inspection in the form of a PDF document from the LINKO database. The information did not include the chain-of-custody forms or raw analytical data; rather, it was a summary of the sampling results, date of analysis, method used, and permitted limits. According to the federal regulations at 40 CFR 403.12(o), “Any IU and POTW subject to the reporting requirements established in this section shall maintain records of all information resulting from any monitoring activities required by this section.” From the files reviewed during the 2014 inspection, it was found that the original analytical data, chain-of-custody forms, and documentation for compliance monitoring events were not included in the hardcopy files. The City is required to ensure that the appropriate

documentation for monitoring activities are properly recorded and available in accordance with the federal regulations at 40 CFR 403.12(o).

According to the 2011 inspection report, the federal pretreatment regulations at 40 CFR 403.12(g)(3) required that wastewater samples be collected, preserved, and analyzed using protocols specified in 40 CFR part 136. The federal regulations at 40 CFR part 136, Table II, required that pH be analyzed within 15 minutes of collection. The chain-of-custody forms for the City's compliance sampling at its SIUs (which include Land O'Lakes, Morningstar Foods, Saputo-Levine, Dreyers, Saputo-Paige, Ruiz, and Kraft Foods, Inc.) on December 2, 2011, detailed the time at which the samples had been collected at each facility and listed the time at which the samples had been relinquished at the laboratory. According to the chain-of-custody forms, the City had collected samples from the SIUs at times ranging from 7:46 a.m. to 9:41 a.m. on December 2, 2011, and the City had relinquished the samples at the laboratory at 10:30 a.m. Based on this information, it was determined that the pH had not been analyzed within 15 minutes of collection. The City was required to collect, preserve, and analyze its samples using protocols specified in 40 CFR part 136, as required at 40 CFR 403.12(g)(3). In response to this requirement, the City stated, "Samples for pH are analyzed within the required 15 minutes [sic]."

As a component of the 2014 inspection, the EPA inspection team requested complete compliance sampling data for all SIUs that were reviewed during the inspection. As stated above, the City provided the EPA inspection team with a summary of the compliance sampling events conducted in 2013. However, the compliance sampling documentation provided by the City did not include chain-of-custody forms. Due to the absence of the chain-of-custody forms, it could not be determined if the samples were collected in accordance with the sampling protocols listed at 40 CFR 136. Additionally, the EPA inspection team requested written documentation for the sampling and monitoring protocols to determine if there were standard procedures in place for sample collection and analysis. City staff was unable to provide this documentation to the inspection team. Therefore, it could not be confirmed that these protocols were in place or were being adhered to. The City is required to ensure that it has documentation of its compliance sampling and monitoring protocols and that samples are collected in accordance with the federal regulations at 40 CFR 136 as required by 40 CFR 403.12(g)(3).

According to the 2011 inspection report, Section 7.20.480 of the SUO available on the Internet stated that the local limits for pH were between 6.0 s.u. and 11.0 s.u. The August and September 2009 reports for the compliance monitoring performed by the City at Land O'Lakes, Morning Star Foods, Saputo-Levine, Saputo-Paige, Dreyers, and Kraft Foods, Inc., were reviewed as a component of the 2011 inspection. There had been a total of 70 individual pH violations in August and September 2009 at the facilities mentioned. The City was required to ensure that its IUs are in compliance with section 7.20.480 of the SUO. In response to this requirement, the City stated, "Industries are required to comply with pH limits."

As a component of the 2014 inspection, section 7.20.480 of the final redline version of the City's SUO was reviewed. According to the SUO and the SIU permits, the City's allowable range for pH is 5.0–11.0 s.u. Compliance data taken by the City at Land O' Lakes, RUAN Transportation, K&M Truck Repair and Paint, Tranter, Inc., and Ruiz Foods, Inc. for 2013 was electronically provided to the EPA inspection team by City staff. From this documentation, it was determined that pH samples collected by the City were in the acceptable permitted range of 5.0–11.0 s.u.

According to the 2011 inspection report and based on discussions with City staff and file reviews, the City did not have adequate sampling and monitoring protocols in place to ensure that its industrial users were in compliance with the pretreatment standards and requirements. The City was required to ensure that discharges are compliant with applicable pretreatment standards and requirements as required at 40 CFR 403.8(f)(2)(v). In response to this requirement, the City stated that the City had sampling and monitoring protocols in place. As previously mentioned, documentation of the sampling and monitoring protocols was requested from the City after the 2014 inspection. The City was unable to provide this information and therefore it could not be confirmed if the City had sampling and monitoring protocols in place for collecting samples for compliance purposes. As previously stated, the City is required to ensure that it has documentation of its compliance sampling and monitoring protocols and that samples are collected in accordance with the federal regulations at 40 CFR 136 as required by 40 CFR 403.12(g)(3).

8.2 Compliance Inspections

The regulations at 40 CFR 403.8(f)(2)(v) require all SIUs to be inspected at least once each year, unless a discharger is subject to the reduced reporting requirements under 40 CFR 403.12(e)(3). The POTW must inspect those dischargers at least once every two years [40 CFR 403.8(f)(2)(v)(C)].

According to the 2011 inspection report, City staff stated that they had not inspected the City's SIUs within the past 12 months and no documentation of inspections was found within the respective files. The City was required to inspect its SIUs at least once a year, as required at 40 CFR 403.8(f)(2)(v). In response to this requirement, the City stated that the City inspects its SIUs at least once a year. However, during the 2014 inspection, it was found during the file review that inspection reports for 2013 were not included in the files for Land O'Lakes, RUAN Transportation, or Saputo Dairy Foods USA. The City is required to inspect the SIUs at least once a year as stated in the federal regulations at 40 CFR 403.8(f)(2)(v). The City should also include written documentation for these activities in the facility files to document specific findings and to provide evidence that the annual inspections were conducted at the SIUs.

City representatives stated that inspection reports are printed from the LINKO database and are used as checklists to conduct facility inspections. During the review of the database, it appeared that some components of the checklist were not efficient or field friendly. City representatives expressed interest in developing a checklist that is designed to meet their needs. It is strongly recommended that the City implement an inspection report system to promote documentation and detailed inspections.

8.3 Nondomestic Discharger Site Inspections Conducted during the Inspection

Site inspections at four permitted nondomestic dischargers were conducted as part of inspection. The dischargers were selected to represent facilities of varying size and classification. The following items were noted during the nondomestic discharger site visits:

- *K&M Truck Repair and Paint.* The facility repaired and washed tanker trucks. The facility washed the inside of the tanks and the outside of the trucks, and occasionally performed painting on the trucks. The trucks are typically used for hauling dairy and

food-grade products. The City classified the facility as an SIU due to the volume and nature of the discharge generated at the facility

The facility had six truck bays and an office. The facility also had a boiler system for generating hot water for the truck washing process. The facility contact stated that the washing process for trucks typically takes 45 minutes.

The facility discharged pretreated wastewater from the truck washing operations to the sanitary sewer. The wash waters were treated in a three-stage oil and water separator before being discharged to the sanitary sewer. It should be noted that wash waters were observed flowing directly from a truck washing bay into a storm drain.

Wastewater from the truck wash flows into a three-stage oil and water separator before being discharged to the sanitary sewer.

In route to conduct a site inspection at the RUAN Transportation facility, the EPA inspection team noticed wash waters actively flowing from the K&M Truck Repair facility into a nearby stormdrain. The stormdrain was located at the intersection of South Blackstone Street and Martin Luther King, Jr. Avenue, approximately 200 feet from the facility. The facility contact stated that it was a normal activity for some of the untreated wash waters from the truck washing bay to be discharged into the stormdrain.

This observation was discussed with the City representative. It was recommended that the proper authorities be notified of the stormwater concern. After the inspection, the City representative stated that the City conducted an inspection at the facility the day after the inspection team's site visit. The City stated that the stormdrain the wash waters were draining into was vacuumed and cleaned.

During the inspection of the chemicals stored at the facility, it was observed that a tote of acidic solution and a tote of a basic solution were stored in close proximity to one another without secondary containment. This storage practice creates a potential safety hazard in the event of a leak or spill and subsequent mixture of solutions. In addition, the chemicals were stored without secondary containment near a drain which the facility contact stated led to the sanitary sewer system. Also, it was observed that a hazardous waste storage drum at the facility had a label but the hazardous waste accumulation start date had not been documented. Secondary containment was not provided for the hazardous waste drum. It is recommended that the City conduct a followup inspection to ensure that chemicals are properly stored and managed in a manner that minimizes the potential for a slug discharge, spill, or other potential safety hazard.

- *Land O' Lakes.* The facility manufactures dairy products such as dry milk and various butter products. The City has classified the facility as an SIU due to the nature and volume of discharge from the facility.

The facility contact stated that approximately eight million pounds of milk is delivered to the facility per day. The raw milk enters the plant via tanker trucks and is weighed before being introduced into separators. The separators extract the fat from the milk, which is

used for the butter production. The resulting non-fat milk is used in the dry milk production process. It should be noted that the inside of the main process area at the facility was not inspected due to the concern of product contamination.

Since the inspection team was unable to review the inside of the facility, the outsides of multiple buildings were visited during the facility inspection. The interior of the evaporator building was also visited. The following observations were made regarding these areas:

- Powder dryer 1—The outside of this building was visited during the inspection. It should be noted that the facility had four powder drying buildings, each similar in operation. However, the most thorough inspection was conducted at powder dryer 1 due to construction activities around the other powder dryer buildings. At these buildings, water was removed from the milk product. This water is referred to as cow water and was either discharged to the sanitary sewer or used for the boiler operation. The cow water was introduced to an reverse osmosis (RO) machine before being used as boiler water. The reject RO water was also discharged to the sanitary sewer from these buildings. A number of liquid chemicals were stored outside the powder dryer buildings. In addition, a conical tank in a bermed area with a drain was located outside of the powder dryer 1 building. This tank was used for the collection of “grit and grime” from the dry milk production process. The facility contact stated that once or twice per week the tank was “purged” to the drain, which leads to the sanitary sewer.
- Truck washing stations—The facility had a number of truck washing stations that were located outside with overhead coverage. Here, the interiors of the dairy truck tanks were rinsed after the trucks delivered milk to the facility.
- Evaporator building—This building housed the solids recovery evaporation tanks, a variety of chemicals, and capture tanks used for mixing the caustic and acidic wastewaters generated from the CIP process. The solid recovery evaporation tanks evaporated the liquids from the initial flushing of product in the first step of the clean-in-place (CIP) process. The solids were then hauled offsite. At the time of the inspection, one of the tanks was discharging a yellow-brown colored wastewater to the sanitary sewer.

The facility discharges untreated pump seal water, boiler blowdown, RO reject water, CIP wash waters and truck wash waters to the City’s sanitary sewer. The facility contact stated that sometimes the CIP rinse water from the caustic step in the CIP process and the acidic wastewaters from the acid rinse step in the CIP process are mixed, in an effort to adjust the pH of the wastewater before discharging it to the sanitary sewer. Additionally, the facility produces “cow water” as a byproduct from removing the moisture when producing the dry milk product. The facility contact stated that sometimes the cow water is discharged to the sanitary sewer and sometimes it is used in the boiler and is ultimately discharged to the sanitary sewer as boiler blowdown.

The facility does not have a pretreatment system.

The City's wastewater inspector did not accompany the EPA inspection team during the facility inspection due to an injury that inhibited his ability to safely maneuver around the facility. The City's wastewater inspector informed the facility by phone of the inspection prior to the EPA inspection team arriving on site.

The site inspection mainly consisted of an inspection of the outside of various dry milk production areas and the area housing capture tanks for the CIP wastewaters. The facility representative showed concern about the EPA inspection team entering the main production area due to the possibility of product contamination. The facility contact stated that it has been a number of years since the City inspector had inspected the inside production area of the facility. According to the federal regulations at 40 CFR 403.8(f)(2)(v), the City is to conduct surveillance activities in order to identify, independent of information supplied by the IU, occasional and continuing noncompliance with pretreatment standards. Therefore, the City is required to ensure that a thorough inspection of the facility's main production areas is performed in accordance with the federal regulations at 40 CFR 403.8(f)(2)(v).

During the file review, prior to the site inspection, it was determined that the self-monitoring reports submitted by the facility to the City indicated a number of effluent violations for pH, EC, sodium, and oil and grease. During the site inspection, it was confirmed that the facility did not have a pretreatment system and was directly discharging process wastewaters to the sanitary sewer. The facility contact stated that the facility was looking into implementing a pretreatment system in order to reduce the number of effluent violations occurring at the facility. It is strongly recommended that the City work closely with the facility to ensure that the pretreatment system is adequate in treating the wastewater being discharged to the sanitary sewer and to be aware of any major changes in process and operation which may affect the characteristics of the wastewater being discharged from the facility.

While inspecting the outside areas of the process buildings, the inspection team observed a number of 55-gallon drums for which secondary containment units were not provided. In addition, there were chemicals stored on a secondary containment unit, but the containment unit was half full of what appeared to be rainwater. Therefore, if a spill or leak were to occur, the secondary containment unit may not have the capacity to store the chemical. Furthermore, this secondary chemical storage unit and associated chemicals were stored on a sloped concrete ramp, which may increase the likelihood for a chemical spill to occur that cannot be contained. It is strongly recommended that the City conduct a followup inspection at the facility to ensure that chemicals are properly stored.

The facility contact stated that the following steps comprise the CIP process:

- Product flush out—this step typically takes five minutes. The equipment used for the formulation of the dry milk and butter products is flushed with water as the initial step in the cleaning process. The wastewater from this process is sent to the solids recovery evaporator. From the evaporator, the solids are hauled offsite as animal feed and the extracted moisture is evaporated.

- Balance tank with caustic–water and a caustic solution are added to the formulation tanks and equipment. This process takes approximately 30 minutes.
- Flush–the tank and caustic solution are flushed.
- Balance tank with acid–water and an acid solution are added to the formulation tanks and equipment. This process also takes approximately 30 minutes.
- Flush–the tank and acid solution are flushed.
- The facility contact stated that sometimes the wastewaters generated from the balance tank with caustic step and the balance tank with acid step are collected in a capture tank. These wastewaters are sometimes mixed in an effort to neutralize the pH of the wastewater before discharging it to the sanitary sewer.

During the inspection of the powder dryer 1 building, a conical tank was observed stored outside the facility in a bermed area with a drain. The facility contact stated that the conical tank was used for the storage of “grit and grime” generated as part of the dry milk production process. The facility contact also stated that this tank was purged one or two times per week depending upon production rates. According to the facility contact, the tank was purged to the sanitary sewer. According to Section 2.D of the facility permit, “Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.” From the nature of the discharge described by the facility contact, it appeared that the solids and sludges from the conical tank were not being properly disposed of. It is also of concern that this type of discharge may cause a slug discharge or negatively impact the collection system. Therefore, the City is required to ensure that the facility is properly disposing of wastes as stated in Section 2.D of the facility permit.

During the inspection, facility personnel appeared generally unaware of certain drain and pipe destinations. There were a number of drains located outside the facility that may have led to the stormdrain or to the sanitary sewer system. In the event that drains outside lead to the sanitary sewer, there is concern that stormwater has the ability to be discharged to the sanitary sewer. In addition, if there are storm drains onsite that lead to a water body, it is of concern that non-stormwaters (truck wash waters) are being discharged to a nearby water body. It is strongly recommended that the City conduct a followup inspection to determine where these drains lead.

- *RUAN Transportation.* The facility is a truck maintenance shop that washes and repairs large hauling and tanker trucks. Wastewater generated from a parts washing machine at the facility are hauled offsite for proper disposal. The facility is classified as an SIU due to the nature of wastewater generated at the facility.

The facility had 12 truck bays and an office area in the middle of the building. Some of the bays were used for truck washing and others were used as areas to perform repairs on trucks. The facility also had rooms for storing truck parts, tires, and used oil.

The facility discharges wastewater from its truck washing operations to the sanitary sewer. It should be noted that the facility only washes the outside of the tanker trucks. The facility does not have a pretreatment system.

The EPA inspection team reviewed a waste manifest in which 250 gallons of non-RCRA (Resource Conservation and Recovery Act) hazardous waste liquid (used oil) was hauled offsite on January 8, 2014.

During the inspection of a bay where waste oil was collected, a number of used oil containers were observed in the used oil storage areas without labels. It is strongly recommended that the City ensure that chemicals stored at the SIU facilities are properly labeled and disposed of.

It should be noted that the City inspector notified the facility contact that the EPA inspectors were planning to conduct an inspection at the facility. The City inspector did not accompany the EPA inspection team to the facility due to the fact that the inspector was using crutches, which may have posed a safety risk.

The facility's permit states that its flow allowance is 7,806 gallons per day. It should be noted that the facility wash discharging truck wash waters at the time of the site inspection.

- *Saputo Dairy Foods USA*. The facility manufactured and shipped cultured dairy products, such as sour cream and cottage cheese, utilizing homogenization, pasteurizations, blending, and packaging. The City has classified the facility as an SIU due to the nature and volume of discharge from the facility.

Raw milk product was pumped to two 40,000-gallon milk silos and four 6,000-gallon cream silos. Raw product was blended using three 3,000-gallon blend tanks. Whey and curd was separated from the raw milk and the curd was used for the production of various grades of sour cream and cottage cheese. Whey collected from the curd separation process, as well as whey collected from rinse waters, was pumped to an 18,000-gallon wastewater storage tank and hauled offsite for animal feed. The separated cheese curd was cooled in a cooling tower and stored in seven hydro silos. Each hydro silo was equipped with an electric conductivity (EC) meter. All cooling water from the curd cooling process and rinse water from the hydro silos was pumped to the reverse osmosis (RO) unit.

The facility operated two CIP systems, one for the pasteurization system and one for the raw product processing system. In addition, wash tanks containing clean-in-place (CIP) cleaning solution were used to sanitize equipment from the cottage cheese and sour cream production lines. All CIP wash waters were collected in various sumps and pumped to the pretreatment unit. CIP standard operating procedures for the different process areas were maintained at the facility and made available for review. The facility conducted CIP cycles of all facility equipment using caustic solution and sanitizing agents every 24 hours. Once a month, the facility conducted an acid wash of all product tanks. Chemical agent concentration checks were conducted for each wash cycle, and all

CIP events and concentrations used were logged. Every Saturday, the facility conducted a wet cleanup of all the facility floors using CIP solution. During this process, solids screens were put over all floor drains to prevent any solids from being flushed to the pretreatment system.

The facility discharged cheese curd cooling water, RO reject water, and CIP wash waters to the City's sanitary sewer.

Sanitation wastewaters from the facility's CIP processes flow to floor drains in the process rooms; the floor drains flow to various sumps. Solids are screened from the wastewaters that accumulate in the sumps. The screened wastewaters are pumped to a treatment tank, where the pH is adjusted using aqueous ammonia. Treated wastewater is then discharged to the sanitary sewer.

The City's wastewater inspector did not accompany the EPA inspection team during the facility inspection due to an injury that inhibited his ability to safely maneuver around the facility. The City's wastewater inspector informed the facility by phone of the inspection prior to the EPA inspection team arriving on site.

The facility representatives explained that the facility typically operates on well water but has the ability to pull water from the City if needed. At the time of the inspection, the facility was using City water due to scheduled maintenance occurring on the facility's well.

The facility was in the process of upgrading the whey storage tank. At the time of the inspection, the facility was using an 18,000-gallon tank to store whey wastewater that is waiting to be hauled offsite. The facility representatives stated that the facility was planning to upgrade to a 25,000-gallon whey waste storage tank sometime in the near future. The new whey storage system will allow the facility to separate good whey and unusable whey to increase the amount of whey waste that can be reused, and minimize the amount of whey waste that is discharged to the publically owned treatment works (POTW). It is recommended that the City follow up with the facility to learn more about the facility's extensive, solids-recovery-program planned upgrades to the whey storage tank.

Cooling and rinse waters from the curd tanks are pumped to a reverse osmosis (RO) unit. Solids are screened from the wastewater prior to its entering the RO unit to prevent blinding the system. Effluent from the RO unit is reused in the facility's processes. RO reject stream is pumped to the treatment tank and discharged to the sanitary sewer.

A floor drain was located immediately downgradient of a battery charging station on the north side of the facility. The facility representatives did not know if the floor drain had been plugged. Vehicles using the battery charging unit would be positioned on or near the floor drain. Materials from the vehicles that may leak or spill would enter the floor drain. It is recommended that the City follow up with the facility to determine if the floor drain has been plugged.

- *Tranter, Inc.* The facility performed servicing and cleaning of heat transfer unit contact plates. The facility representative stated that the facility received used heat transfer contact plates from various customers, including the petroleum, citrus, and dairy industries. The facility representative explained that the heat transfer contact plates must be cleaned periodically to remove any accumulated material and residuals. Plate cleaning entailed a caustic solution wash, an acid solution wash, a static rinse (i.e., dead rinse), and power washing. Plate servicing entailed conducting a black light dye test to ensure plate integrity and replacing the plate gasket.

The inspection team visited two process areas at the facility:

- Chemical tank containment area – This area of the facility was used for cleaning the heat transfer unit plates by passing them through a series of acid, caustic, and static (i.e., dead) rinse tanks. Multiple plates were loaded onto a rack and dipped in the different tanks by an overhead mechanical crane system. The facility representative explained that the plates were first dipped into a heated caustic solution tank, which contained a 20 percent solution of sodium hydroxide. The plates were then dipped into a non-heated static (i.e., dead) rinse tank prior to being dipped into a heated acid solution tank, which contained a 20 percent solution of phosphoric acid. After the acid tank, the plates were dipped again into the non-heated static rinse tank. After each dip, the “drag out” is allowed to drain over the respective tank to prevent chemistry from mixing.
- Power wash/dye check area – In this area of the facility, the plates were power washed to remove excess material remaining after the chemical cleaning process. Power washing occurred within a concrete-bermed area of the facility and the wash water was collected in a floor drain. Detergents were not used in the power washing process. Once the plates had been power washed, they were coated with a fluorescent dye in an adjacent bermed area of the facility and inspected using a black light for additional material deposits, cracks, or other integrity issues. Once the plates had been inspected, the dye was rinsed off and new gaskets were installed on the plates.

The facility discharged treated wastewaters from its contact plate power washing and dye rinsing activities; the pretreated wastewaters were collected and stored in a 2,100-gallon storage tank, located outside. Overflow wash and rinse waters from the chemical tank containment area were collected in a floor drain within the containment area and were piped to the outside, 2,100-gallon wastewater storage tank. The facility performed a weekly batch discharge event of approximately 300–700 gallons from the outdoor wastewater storage tank. Rinse water from the static rinse tank (i.e., dead rinse) is not discharged to the sanitary sewer.

The facility filters wastewater generated from the power washing by a 50-micron fabric filter prior to the water’s entering the 2,100-gallon wastewater storage tank, located outside the facility. Wastewater from the 2,100-gallon storage tank is sent through a wastewater interceptor prior to discharging into the City’s sanitary sewer system.

NOTE: The pretreatment system is reported as it was observed during this inspection.

The City's wastewater inspector did not accompany the inspection team during the facility inspection due to an injury that inhibited his ability to safely maneuver around the facility. The City's wastewater inspector informed the facility by phone of the inspection prior to the EPA inspection team arriving on site.

The EPA inspection team conducted an inspection at Tranter, Inc. as a component of the 2014 inspection. At the time of the inspection, the facility was classified by the City as a non-categorical SIU. The inspection team expressed concern to the City regarding the classification of the facility due to the use of acids and caustics in the metal plate washing process that is conducted by the facility. The facility representative stated that the removal of metal from the plates by the acid and caustic washes is not the intended purpose of the washing process. However, due to the removal of metals during the metal plate washing process, the facility's metal plate washing process is categorical and therefore regulated under 40 CFR 433, metal finishing category. The City is required to apply the correct categorical classification to the facility as required by 40 CFR 403.8(f)(2)(iii).

The facility maintains a wastewater interceptor located outside, between the 2,100-gallon wastewater storage tank and the facility's discharge location to the City's sanitary sewer. The facility representative stated that the interceptor was cleaned approximately 6–8 months prior to the inspection.

The power wash/dye check area at the facility was contained by a concrete berm. The area was split into two sub-areas, dye check area and power wash area, by a concrete berm. Each sub-area contained a separate floor drain that was connected to the outside, 2,100-gallon wastewater storage tank. A crack was observed in the concrete berm of the power wash sub-area and wash water was observed on the facility floor, outside of the bermed area.

A floor drain was located in the corner of the chemical tank containment area. The floor drain valve was closed at the time of the inspection and can only be opened manually. The facility maintains a critical control point analysis plan onsite which identified the chemical tank containment area as critical control point (CCP) 1.

The City wastewater inspector was not present during the facility inspection; therefore, the location at which the City collects samples was not verified while the inspection team was onsite. The facility representative stated that he believed the City's wastewater inspector collects samples from a manhole located downstream of the facility's interceptor. The facility representative stated that the pH of the wastewater is checked using wastewater samples collected from a sample port located outside at the 2,100-gallon wastewater tank storage tank. However, self-monitoring samples are collected from a manhole located downstream of the facility's interceptor, the same place where the City collects its samples.

8.4 Requesting, Receiving, and Analyzing Reports

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(iv) require the City to request, receive, and analyze all reports submitted by IUs. The IU reports must contain the information required at 40 CFR 403.12. The City is reminded that the pretreatment streamlining provisions have finalized the sampling requirements for all periodic reports required at 40 CFR 403.12(e) and (h). The City is required to ensure that all reports submitted by IUs comply with the provisions of 40 CFR 403.12.

According to the 2011 inspection report, section 4.C of the Standard Conditions of the City's IU permits stated, "If the results of the Permittee's wastewater analysis indicates a violation has occurred, the Permittee must notify the Public Works Director within 24 hours of becoming aware of the violation." There was no documentation in the Dreyers file or Saputo file indicating that either had notified the City within 24 hours of becoming aware of the violation. The City was required to ensure that its industrial users comply with section 4.C of the Standard Conditions of the permit by notifying the City within 24 hours of becoming aware of an effluent violation. In response to this requirement, the City stated that notices of violation (NOVs) are issued for failure to notify the City within 24 hours of a self-monitoring violation. However, as a component of the 2014 inspection, the violations and enforcement correspondence pertaining to violations occurring at the Land O'Lakes facility was reviewed. From the documentation provided in the file, it was determined that the facility had a number of effluent violations for various parameters in 2013 and did not notify the City of these violations. For example, on April 19, 2013 the City issued the facility an NOV for a pH daily limit exceedance of 4.77 s.u. on February 11, 2013. In addition, this NOV addressed another pH daily limit exceedance of 11.39 s.u. on February 12, 2013. From the documentation provided in the file, it was determined that the facility had numerous violations and did not notify the City within 24 hours of becoming aware of those violations. The City is required to ensure that industrial users are notifying the City within 24 hours of becoming aware of a violation as stated in Part 2, section 1.D. of the facility permit.

According to the 2011 inspection report, the federal regulations at 40 CFR 403.12(g)(3) required that wastewater samples be collected, preserved, and analyzed using protocols specified in 40 CFR Part 136. Part 2, section 2, of the Saputo permit stated that oil and grease were to be sampled bimonthly. Table II- Required Containers, Preservation Techniques, and Holding Time in 40 CFR Part 136 requires that glass containers must be used to collect oil and grease samples. The Saputo chain-of-custody form did not indicate a container type for the oil and grease sample collected on October 3, 2011. The City was required to ensure that samples are collected, preserved, and analyzed using the protocols specified in 40 CFR part 136, as required at 40 CFR 403.12(g)(3). In response to this requirement, the City stated, "Industries now sample and hold oil and grease samples in glass containers. The City ensures that all samples are valid for all parameters and that all samples are collected, preserved, and analyzed according to 40 CFR 136." However, as a component of the 2014 inspection, the self-monitoring data from the Land O' Lakes facility from samples collected on July 2, 2013 was reviewed. The chain-of-custody forms did not include information pertaining to the container type in which the oil and grease samples were collected. The City is required to ensure that the facilities are collecting samples in accordance with the sampling protocols at 40 CFR Part 136 as stated in the federal regulations at 40 CFR 403.12(g)(3).

According to the federal pretreatment regulations at 40 CFR 403.8(f)(2)(iv), the City is required to request, receive, and analyze all reports submitted by IUs. As a component of the 2014 inspection, the Land O' Lakes file was reviewed and the self-monitoring reports were compared to the self-monitoring requirements in the facility's permit. According to the frequency column of the table provided in Part 1, Effluent Limits, of the facility's permit, the facility is required to collect quarterly samples for the following parameters: arsenic, boron, cadmium, chromium, copper, iron, lead, manganese, mercury, molybdenum, nickel, selenium, silver, and zinc. A review of the Land O' Lakes 2013 self-monitoring data provided in the facility's file showed that the facility failed to submit self-monitoring reports for two quarters in 2013. Documentation stating the City took enforcement action against the facility for failure to submit two of the quarterly self-monitoring reports for 2013 was not provided in the file. The City is required to adequately request, receive, and analyze reports submitted by industrial users as stated in the federal regulations at 40 CFR 403.8(f)(2)(iv).

8.5 *Slug Discharge Control Plans*

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(vi) require the City to evaluate each SIU, by October 14, 2006 or within one year of the SIU's becoming an SIU, to determine whether the SIU needs to develop and implement a slug discharge control plan (SDCP). A slug discharge is any discharge of a non-routine, episodic nature, including an accidental spill or non-customary batch discharge [40 CFR 403.8(f)(2)(vi)]. The regulations also require each SIU to notify the POTW immediately of any changes at its facility affecting the potential for a slug discharge.

According to the 2011 inspection report, the federal pretreatment regulations at 40 CFR 403.8(f)(2)(vi) required the City to evaluate each SIU, by October 14, 2006 or within one year of the SIU's becoming an SIU, to determine whether the SIU needed to develop and implement an SDCP. There was no documentation within the respective files reviewed during the 2011 inspection indicating that the City had performed slug evaluations of its SIUs. City staff stated that, as a component of their agreement, Carollo Engineers would evaluate each SIU's need for an SDCP. The City was required to determine whether its SIUs need to develop and implement SDCPs as stated at 40 CFR 403.8(f)(2)(vi). In response to this requirement, the City stated, "The General Manager has conducted an evaluation of the requirement for slug discharge control plans and the largest industries will be required to prepare and submit a slug discharge control plan." The City should be aware that requiring SDCPs based on size of the industry is not an adequate approach to determining the need for a plan.

As a component of the 2014 inspection, City representatives stated that 13 of the City's permitted nondomestic dischargers are required to develop and submit SDCPs to the City. According to the federal regulations at 40 CFR 403.8(f)(2)(vi), if the POTW decides that an SDCP is needed, the plan shall include at a minimum the requirements listed at 40 CFR 403.8(f)(2)(vi)(A–D). The Land O' Lakes Accidental Discharge Plan (for Slug Discharge or Accidental Discharge) was reviewed and it was found that the plan does not include the description of discharge practices, including non-routine batch discharge as stated at 40 CFR 403.8(f)(2)(vi)(A) of the federal regulations. The City is required to ensure that facilities required to develop SDCPs do so, and that the plans include the required elements listed at 40 CFR 403.8(f)(2)(vi)(A–D) as required by 40 CFR 403.8(f)(2)(vi) of the federal regulations.

9. Enforcement

The federal pretreatment regulations at 40 CFR 403.8(f)(5) require the City to develop and implement an ERP. This plan must contain detailed procedures indicating how the City will investigate and respond to instances of industrial user noncompliance.

9.1 Identifying Violations and Escalating Enforcement

According to the 2011 inspection report, the federal pretreatment regulations at 40 CFR 403.8(f)(5) required the City to implement its ERP. The August 2009 compliance monitoring reports for Saputo Cheese were reviewed as a component of the 2011 inspection. There had been a total of 11 individual pH violations in August 2009. Section 4 of the City's ERP stated that the City's industrial waste inspector/field personnel was responsible for screening industrial user data and determining the compliance status of the City's industrial users. In addition, section 5 of the City's ERP stated, "All communications will be documented in writing, and the documentation placed in the IU's file." There was no documentation in the Saputo file indicating that the City had identified the pH violations in the August 2009 compliance sampling data. The City was required to implement its ERP as required at 40 CFR 403.8(f)(5).

According to the 2011 inspection report, the federal pretreatment regulations at 40 CFR 403.8(f)(5) required the City to implement an ERP. The September 2009 compliance monitoring reports for Saputo Cheese were reviewed as a component of the 2011 inspection. There had been a total of 18 individual pH violations in September 2009. Table III, Monitoring and Reporting Violations, of the City's ERP stated that if the industrial user had recurring exceedances of local or federal standards, the City could take a range of enforcement responses ranging from automatic industrial user resampling to issuing a criminal action. In addition, section 5 of the City's ERP stated, "All communications will be documented in writing, and the documentation placed in the IU's file." There was no documentation in the Saputo Cheese files indicating the City had taken steps to escalate enforcement due to the recurring pH effluent exceedances for its industrial users. The City was required to implement its ERP as required at 40 CFR 403.8(f)(5).

As a component of the 2014 inspection, the EPA inspection team requested that the City provide the team with a printout from the LINKO database of a summary of effluent violations from the SIUs for 2013. The summary stated that the Land O' Lakes facility had a total of 57 effluent violations for 2013. From the file review, it was determined that the City issued the facility seven NOV's from April 2013 to December 2013. The NOV's reference the language in the SUO providing the City with the legal authority to issue the NOV. In addition, the NOV's state the finding (i.e. effluent violation) and state that the facility must submit a report explaining the circumstance of the violations.

According to section II, Discharge Limit Violations, of the City's ERP Guide (part of the City's ERP), the City is to take the following escalating enforcement actions for exceedances of local or federal standards:

| Nature of the Violation | Range of Enforcement Responses |
|---|---|
| Recurring—2 or more violations within 1, 90-day period or 3 or more violations within 4 rolling quarters. | <ul style="list-style-type: none"> - Automatic IU resampling - Unannounced inspection - Unannounced City sampling - Review meeting - Consent order - Show cause hearing - Compliance order - Cease and desist order - Civil action - Terminate service - Revoke permit - Criminal action. |

From the information provided in the facility file, it was determined that the City was continuously issuing NOV's to the Land O' Lakes facility but was not escalating enforcement action to address the facility's noncompliance and bring the facility back into compliance in a timely manner. The City is required to take escalating enforcement action against facilities that have recurring discharge violations as stated in the City's ERP Guide. The City is required to implement its ERP in accordance with the federal regulations at 40 CFR 403.8(f)(5).

9.2 Violation Notification

According to the 2011 inspection report, the federal pretreatment regulations at 40 CFR 403.8(f)(5) required the City to implement its ERP. After discharging effluent that was not compliant with their permit requirements, Dreyers and Saputo Cheese did not notify the City within 24 hours of becoming aware of the effluent violations. Table III, Monitoring and Reporting Violations, of the City's ERP stated that if an industrial user did not submit a report, the City should issue a cease and desist order or take civil action. In addition, section 5 of the City's ERP stated, "All communications will be documented in writing, and the documentation placed in the IU's file." There was no documentation in the Dreyers or Saputo Cheese files that would indicate that the City had taken the appropriate enforcement action. The City was required to implement its ERP as required at 40 CFR 403.8(f)(5).

As a component of the 2014 inspection, the Land O'Lakes file was reviewed. As previously mentioned, a printout from the LINKO database provided to the EPA inspection team stated that the facility had 57 effluent violations between January 1, 2013 and November, 2013. The information provided in the facility's file indicated that the facility did not notify the City within 24 hours of becoming aware of the effluent violations. The City is required to ensure that the facility notifies the City within 24 hours of becoming aware of a discharge violation as stated at 40 CFR 403.12(g)(2) of the federal regulations.

9.3 SNC Publication

According to the 2011 inspection report, as required at 40 CFR 403.8(f)(2)(viii), the City was required to annually publish all facilities in SNC in a newspaper of general circulation that provided meaningful public notice within the jurisdiction(s) served by the POTW. Based on the information provided by City staff during the 2011 inspection, it was found that the City had not

published Dreyers in a newspaper of general circulation after becoming aware of the industrial user's SNC status. The City was required to publish SIUs in SNC in a newspaper(s) of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW as required at 40 CFR 403.8(f)(2)(viii). In response to this requirement, the City stated, "The city will publish all Significant Non-Compliance annually in the newspaper."

As a component of the 2014 inspection, the facilities in SNC for 2012 and 2013 were discussed. City representatives stated that three of the City's SIUs (Ruiz Foods, Truck Tub, Inc., and RockTenn, Inc.) were in SNC for 2012. The City published a notice in the *Tulare Advance-Register* providing information to the public about the facilities in SNC. City representatives were unable to provide a concrete list of facilities in SNC for 2013 due to the fact that not all of the sampling data had been received.

10. Summary of Requirements and Recommendations

Listed below are the primary requirements and recommendations resulting from the inspection of the City's pretreatment program. For more specific information pertaining to each comment, please refer to the cited sections of the report.

10.1 Requirements

1. According to the federal regulations at 40 CFR 403.8(f)(2)(ii), the City is required to identify the character and volume of pollutants contributed to the POTW by industrial users. The City representatives stated that the City accepts hauled "dirty water" from a newspaper manufacturing plant in Lindsay, CA because the local municipality will not accept the facility's dirty water. During the initial interview process, it was stated that the facility submits sampling data to the City but the City does not conduct local limits sampling for the facility's dirty water. Due to the fact that wastewater from a newspaper manufacturing facility may contain heavy metals (from inks), oil and grease, and pulp material, the wastewater from this facility should be profiled by collecting and analyzing samples of the hauled dirty water. Therefore, the City is required to profile the facility's wastewater in order to identify the character and volume of pollutants contributed to the POTW as stated in the federal regulations at 40 CFR 403.8(f)(2)(ii). In the event that the wastewater profiling indicates that the facility's dirty water constitutes industrial strength wastewater, the City should request further information from the facility to determine if the facility needs to be regulated by an SIU permit. (Section 2.1, Size of Program)
2. The EPA inspection team conducted an inspection at Tranter, Inc. as a component of the 2014 inspection. At the time of the inspection, the facility was classified by the City as a non-categorical SIU. The inspection team expressed concern to the City regarding the classification of the facility due to the use of acids and caustics in the metal plate washing process that is conducted by the facility. The facility representative stated that the removal of metal from the plates by the acid and caustic washes is not the intended purpose of the washing process. However, due to the removal of metals during the metal plate washing process, the facility's metal plate washing process is categorical and therefore regulated under 40 CFR 433, metal finishing category. The City is required to apply the correct categorical classification to the facility as required by 40 CFR 403.8(f)(2)(iii). For more information pertaining to the Tranter, Inc. facility, refer to section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection.

(Section 5, Nondomestic Discharger Characterization and Section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection)

3. As a component of the 2014 inspection, the permits were reviewed to determine if the appropriate modifications pertaining to the permit issuance and effective date had been completed. A review of the permits revealed that a permit effective date was not provided on the permits. The date on which the permit was signed by the wastewater superintendent was included, but this was not indicated as the effective date. Without the documentation of the permit effective date, it was unclear to the EPA inspection team if the permits had been issued before they became effective. The permits must be issued before they become effective so that permittees are aware of their responsibility in upholding permit conditions and applying with said conditions before the permits becomes effective. The City is required to ensure that permits are issued to the facilities before they become effective. (Section 6.3, Permit Issuance and Effective Date)
4. According to section 7.20.780 of the final redline version of the City's SUO, "Wastewater discharge permits are issued to a specific user for a specific operation. A wastewater discharge permit shall not be reassigned or transferred or sold to a new owner, new user, different premises, a new or changed operation or remodel of an existing facility which is retained by the current owner." During the time of the inspection, the Saputo Dairy Foods USA facility on J Street had been previously owned by Morningstar Foods. The permit located in the Saputo Dairy Foods USA file was issued under the name of Morningstar Foods. After the inspection, City representative stated that a new permit for Saputo Dairy Foods USA had not been issued to the facility. The City is required to ensure that the Saputo Dairy Foods USA facility is covered by a permit that is specifically issued to the facility as required by section 7.20.780 of the City's SUO. (Section 6.5, Permit Transfer)
5. As a component of the 2014 inspection, the EPA inspection team requested the 2013 complete compliance sampling data, which was provided to the EPA inspection team after the inspection in the form of a PDF document from the LINKO database. The information did not include the chain-of-custody forms or raw analytical data; rather, it was a summary of the sampling results, date of analysis, method used, and permitted limits. According to the federal regulations at 40 CFR 403.12(o), "Any IU and POTW subject to the reporting requirements established in this section shall maintain records of all information resulting from any monitoring activities required by this section." From the files reviewed during the 2014 inspection, it was found that the original analytical data, chain-of-custody forms, and documentation for compliance monitoring events were not included in the hardcopy files. The City is required to ensure that the appropriate documentation for monitoring activities are properly recorded and available in accordance with the federal regulations at 40 CFR 403.12(o). (Section 8.1, Compliance Sampling)
6. As a component of the 2014 inspection, the EPA inspection team requested complete compliance sampling data for all SIUs that were reviewed during the inspection. As stated above, the City provided the EPA inspection team with a summary of the compliance sampling events conducted in 2013. However, the compliance sampling documentation provided by the City did not include chain-of-custody forms. Due to the

absence of the chain-of-custody forms, it could not be determined if the samples were collected in accordance with the sampling protocols listed at 40 CFR 136. Additionally, the EPA inspection team requested written documentation for the sampling and monitoring protocols to determine if there were standard procedures in place for sample collection and analysis. City staff was unable to provide this documentation to the inspection team. Therefore, it could not be confirmed that these protocols were in place or were being adhered to. The City is required to ensure that it has documentation of its compliance sampling and monitoring protocols and that samples are collected in accordance with the federal regulations at 40 CFR 136 as required by 40 CFR 403.12(g)(3). (Section 8.1, Compliance Sampling)

7. According to the 2011 inspection report, City staff stated that they had not inspected the City's SIUs within the past 12 months and no documentation of inspections was found within the respective files. The City was required to inspect its SIUs at least once a year, as required at 40 CFR 403.8(f)(2)(v). In response to this requirement, the City stated that the City inspects its SIUs at least once a year. However, during the 2014 inspection, it was found during the file review that inspection reports for 2013 were not included in the files for Land O'Lakes, RUAN Transportation, or Saputo Dairy Foods USA. The City is required to inspect the SIUs at least once a year as stated in the federal regulations at 40 CFR 403.8(f)(2)(v). The City should also include written documentation for these activities in the facility files to document specific findings and to provide evidence that the annual inspections were conducted at the SIUs. (Section 8.2, Compliance Inspections)
8. The site inspection at the Land O'Lakes facility mainly consisted of an inspection of the outside of various dry milk production areas and the area housing capture tanks for the CIP wastewaters. The facility representative showed concern about the EPA inspection team entering the main production area due to the possibility of product contamination. The facility contact stated that it has been a number of years since the City inspector had inspected the inside production area of the facility. According to the federal regulations at 40 CFR 403.8(f)(2)(v), the City is to conduct surveillance activities in order to identify, independent of information supplied by the IU, occasional and continuing noncompliance with pretreatment standards. Therefore, the City is required to ensure that a thorough inspection of the facility's main production areas is performed in accordance with the federal regulations at 40 CFR 403.8(f)(2)(v). (Section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection)
9. During the inspection of the powder dryer 1 building at the Land O'Lakes facility, a conical tank was observed stored outside the facility in a bermed area with a drain. The facility contact stated that the conical tank was used for the storage of "grit and grime" generated as part of the dry milk production process. The facility contact also stated that this tank was purged one or two times per week depending upon production rates. According to the facility contact, the tank was purged to the sanitary sewer. According to Section 2.D of the facility permit, "Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act." From the nature of the discharge described by the facility contact, it appeared that the solids and sludges from the conical tank were not being properly disposed of. It is also of concern that this type of discharge may cause

a slug discharge or negatively impact the collection system. Therefore, the City is required to ensure that the facility is properly disposing of wastes as stated in Section 2.D of the facility permit. (Section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection)

10. As a component of the 2014 inspection, the violations and enforcement correspondence pertaining to violations occurring at the Land O' Lakes facility was reviewed. From the documentation provided in the file, it was determined that the facility had a number of effluent violations for various parameters in 2013 and did not notify the City of these violations. For example, on April 19, 2013 the City issued the facility an NOV for a pH daily limit exceedance of 4.77 s.u. on February 11, 2013. In addition, this NOV addressed another pH daily limit exceedance of 11.39 s.u. on February 12, 2013. From the documentation provided in the file, it was determined that the facility had numerous violations and did not notify the City within 24 hours of becoming aware of those violations. The City is required to ensure that industrial users are notifying the City within 24 hours of becoming aware of a violation as stated in Part 2, section 1.D. of the facility permit. (Section 8.4, Requesting, Receiving, and Analyzing Reports)
11. According to the 2011 inspection report, the federal regulations at 40 CFR 403.12(g)(3) required that wastewater samples be collected, preserved, and analyzed using protocols specified in 40 CFR Part 136. Part 2, section 2, of the Saputo permit stated that oil and grease were to be sampled bimonthly. Table II- Required Containers, Preservation Techniques, and Holding Time in 40 CFR Part 136 requires that glass containers must be used to collect oil and grease samples. The Saputo chain-of-custody form did not indicate a container type for the oil and grease sample collected on October 3, 2011. The City was required to ensure that samples are collected, preserved, and analyzed using the protocols specified in 40 CFR part 136, as required at 40 CFR 403.12(g)(3). In response to this requirement, the City stated, "Industries now sample and hold oil and grease samples in glass containers. The City ensures that all samples are valid for all parameters and that all samples are collected, preserved, and analyzed according to 40 CFR 136." However, as a component of the 2014 inspection, the self-monitoring data from the Land O' Lakes facility from samples collected on July 2, 2013 was reviewed. The chain-of-custody forms did not include information pertaining to the container type in which the oil and grease samples were collected. The City is required to ensure that the facilities are collecting samples in accordance with the sampling protocols at 40 CFR Part 136 as stated in the federal regulations at 40 CFR 403.12(g)(3). (Section 8.4, Requesting, Receiving, and Analyzing Reports)
12. According to the federal pretreatment regulations at 40 CFR 403.8(f)(2)(iv), the City is required to request, receive, and analyze all reports submitted by IUs. As a component of the 2014 inspection, the Land O' Lakes file was reviewed and the self-monitoring reports were compared to the self-monitoring requirements in the facility's permit. According to the frequency column of the table provided in Part 1, Effluent Limits, of the facility's permit, the facility is required to collect quarterly samples for the following parameters: arsenic, boron, cadmium, chromium, copper, iron, lead, manganese, mercury, molybdenum, nickel, selenium, silver, and zinc. A review of the Land O' Lakes 2013 self-monitoring data provided in the facility's file showed that the facility failed to submit self-monitoring reports for two quarters in 2013. Documentation stating the City took

enforcement action against the facility for failure to submit two of the quarterly self-monitoring reports for 2013 was not provided in the file. The City is required to adequately request, receive, and analyze reports submitted by industrial users as stated in the federal regulations at 40 CFR 403.8(f)(2)(iv). (Section 8.4, Requesting, Receiving, and Analyzing Reports)

13. As a component of the 2014 inspection, City representatives stated that 13 of the City's permitted nondomestic dischargers are required to develop and submit SDCPs to the City. According to the federal regulations at 40 CFR 403.8(f)(2)(vi), if the POTW decides that an SDCP is needed, the plan shall include at a minimum the requirements listed at 40 CFR 403.8(f)(2)(vi)(A–D). The Land O' Lakes Accidental Discharge Plan (for Slug Discharge or Accidental Discharge) was reviewed and it was found that the plan does not include the description of discharge practices, including non-routine batch discharge as stated at 40 CFR 403.8(f)(2)(vi)(A) of the federal regulations. The City is required to ensure that facilities required to develop SDCPs do so, and that the plans include the required elements listed at 40 CFR 403.8(f)(2)(vi)(A–D) as required by 40 CFR 403.8(f)(2)(vi) of the federal regulations. (Section 8.5, Slug Discharge Control Plans)
14. From the information provided in the facility file, it was determined that the City was continuously issuing NOVs to the Land O' Lakes facility but was not escalating enforcement action to address the facility's noncompliance and bring the facility back into compliance in a timely manner. The City is required to take escalating enforcement action against facilities that have recurring discharge violations as stated in the City's ERP Guide. The City is required to implement its ERP in accordance with the federal regulations at 40 CFR 403.8(f)(5). (Section 9.1, Identifying Violations and Escalating Enforcement)
15. As a component of the 2014 inspection, the Land O'Lakes file was reviewed. As previously mentioned, a printout from the LINKO database provided to the EPA inspection team stated that the facility had 57 effluent violations between January 1, 2013 and November, 2013. The information provided in the facility's file indicated that the facility did not notify the City within 24 hours of becoming aware of the effluent violations. The City is required to ensure that the facility notifies the City within 24 hours of becoming aware of a discharge violation as stated at 40 CFR 403.12(g)(2) of the federal regulations. (Section 9.2, Violation Notification)

10.2 Recommendations

1. City representatives stated that every load of hauled waste discharged at the WWTP is sampled for pH and electrical conductivity (EC) for billing purposes. City representatives stated that if the wastewater exceeds the City's local limits for pH or EC, the City charges the waste hauler a higher disposal fee. Apart from pH and EC, the City does not conduct regular monitoring of hauled wastes for all the parameters included in the City's local limits. It is recommended that the City conduct monitoring of the hauled waste, at least

randomly, in order to determine the characteristics of the hauled wastes pollutants being discharged at the WWTP. (Section 2.1, Size of Program)

2. Due to the timing of the inspection (early January), City staff had not fully calculated the number of SIUs in SNC for discharge and reporting violations for 2013 at the time of the inspection. Various lists pertaining to which of the City's SIUs were in SNC for 2013 were generated during and after the inspection. The City stated that it publishes SIUs in SNC in the *Tulare Advance-Register*. It is recommended that the City regularly review facility violations in comparison to the definitions of SNC and escalate compliance and enforcement activities to ensure compliance with industrial user permits. In addition, it is recommended that the City assess the facilities' potential SNC status and discuss such status with the industrial users. (Section 2.2.1, SIUs in Significant Noncompliance)
3. It is recommended that the City continue to develop its pharmaceutical take-back program. The City could target locations such as senior care centers, hospitals, and pharmacies. Pharmaceutical waste in the publicly owned treatment works' (POTW's) effluent can have a detrimental effect on the health of receiving waters. Pharmaceutical take-back events have proven to be a simple and effective way of reducing the harmful effects of pharmaceuticals on human health and aquatic organisms. Successful take-back programs have been implemented in California's San Francisco Bay Area by the Bay Area Pollution Prevention Group (BAPPG); EPA considers the BAPPG programs to be model systems. (Section 2.2.2, Pharmaceuticals Management)
4. City representatives were unsure if the measured mercury concentrations of the WWTP's influent, effluent, and sludge were increasing, decreasing, or had remained unchanged over the past five years. It is recommended that the City continue to work with its contracted engineer to develop and implement a dental mercury control program. (Section 2.2.4, Dental Mercury Control)
5. The City did not have any industrial laundries within its service area at the time of the inspection. It is recommended that the City discuss and review the EPA's Safer Detergents Stewardship Initiative (SDSI) program with any industrial laundries that move into the City's service area. SDSI is a voluntary program to commit to the use of safer surfactants. Safer surfactants are those which break down quickly to non-polluting compounds, helping to protect aquatic life in both freshwater and salt water environments. Nonylphenol ethoxylates (NPEs) are an example of a surfactant class that does not meet the definition of a safer surfactant. (Section 2.2.5, Industrial Laundries)
6. In addition, it was stated that the City's collection crew notifies pretreatment program staff of FOG-related SSO events; however, these communications are typically informal. Upon being notified of an SSO, the pretreatment program staff may distribute information regarding proper disposal of FOG waste to the public in the area in which the SSO occurred. It is recommended that the City develop a formal line of communication with the collections crew so that FOG-related SSOs are properly referred to the pretreatment program. The pretreatment program will then be able to conduct inspections of FSEs to determine if a FOG-related SSO can be attributed to a specific FSE and then to provide outreach materials about the proper disposal of FOG waste. (Section 2.2.6, Performance Measures)

7. It is recommended that the City develop and distribute outreach materials educating the public about the proper disposal of nonwoven disposable products in an effort to reduce non-flushable materials in the wastewater stream and ultimately to protect the City's POTW. (Section 2.2.7, Nonwoven Disposable Products)
8. City representatives stated that the City's water department has the ability to review water accounts for high volumes of usage. Additionally, the City is in contact with the City of Tulare Fire Department, which conducts annual inspections of the City's WWTP. The City also performs drive-by inspections while en route to conduct other inspections or while collecting samples. It is recommended that City review water accounts for high usage on a quarterly basis and conduct Internet searches for existing IUs using the EPA's Envirofacts Web site in a further effort to identify nondomestic dischargers. In addition, it is recommended that City discuss potential nondomestic dischargers with the local Certified Unified Program Agencies (CUPA) as these entities may have valuable information related to potential nondomestic dischargers. (Section 5, Nondomestic Discharger Characterization)
9. City representatives stated that inspection reports are printed from the LINKO database and are used as checklists to conduct facility inspections. During the review of the database, it appeared that some components of the checklist were not efficient or field friendly. City representatives expressed interest in developing a checklist that is designed to meet their needs. It is strongly recommended that the City implement an inspection report system to promote documentation and detailed inspections. (Section 8.2, Compliance Inspections)
10. During the inspection of the chemicals stored at the K&M Truck Repair and Paint facility, it was observed that a tote of acidic solution and a tote of a basic solution were stored in close proximity to one another without secondary containment. This storage practice creates a potential safety hazard in the event of a leak or spill and subsequent mixture of solutions. In addition, the chemicals were stored without secondary containment near a drain which the facility contact stated led to the sanitary sewer system. Also, it was observed that a hazardous waste storage drum at the facility had a label but the hazardous waste accumulation start date had not been documented. Secondary containment was not provided for the hazardous waste drum. It is recommended that the City conduct a followup inspection to ensure that chemicals are properly stored and managed in a manner that minimizes the potential for a slug discharge, spill, or other potential safety hazard. (Section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection)
11. During the file review, prior to the site inspection at the Land O' Lakes facility, it was determined that the self-monitoring reports submitted by the facility to the City indicated a number of effluent violations for pH, EC, sodium, and oil and grease. During the site inspection, it was confirmed that the facility did not have a pretreatment system and was directly discharging process wastewaters to the sanitary sewer. The facility contact stated that the facility was looking into implementing a pretreatment system in order to reduce the number of effluent violations occurring at the facility. It is strongly recommended that the City work closely with the facility to ensure that the pretreatment system is adequate

in treating the wastewater being discharged to the sanitary sewer and to be aware of any major changes in process and operation which may affect the characteristics of the wastewater being discharged from the facility. (Section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection)

12. While inspecting the outside areas of the process buildings at the Land O'Lakes facility, the inspection team observed a number of 55-gallon drums for which secondary containment units were not provided. In addition, there were chemicals stored on a secondary containment unit, but the containment unit was half full of what appeared to be rainwater. Therefore, if a spill or leak were to occur, the secondary containment unit may not have the capacity to store the chemical. Furthermore, this secondary chemical storage unit and associated chemicals were stored on a sloped concrete ramp, which may increase the likelihood for a chemical spill to occur that cannot be contained. It is strongly recommended that the City conduct a followup inspection at the facility to ensure that chemicals are properly stored. (Section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection)
13. During the inspection at the Land O'Lakes facility, facility personnel appeared generally unaware of certain drain and pipe destinations. There were a number of drains located outside the facility that may have led to the stormdrain or to the sanitary sewer system. In the event that drains outside lead to the sanitary sewer, there is concern that stormwater has the ability to be discharged to the sanitary sewer. In addition, if there are storm drains onsite that lead to a water body, it is of concern that non-stormwaters (truck wash waters) are being discharged to a nearby water body. It is strongly recommended that the City conduct a followup inspection to determine where these drains lead. (Section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection)
14. During the inspection of a bay where waste oil was collected at the RUAN Transportation facility, a number of used oil containers were observed in the used oil storage areas without labels. It is strongly recommended that the City ensure that chemicals stored at the SIU facilities are properly labeled and disposed of. (Section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection)
15. The Saputo Dairy Foods USA facility was in the process of upgrading the whey storage tank. At the time of the inspection, the facility was using an 18,000-gallon tank to store whey wastewater that is waiting to be hauled offsite. The facility representatives stated that the facility was planning to upgrade to a 25,000-gallon whey waste storage tank sometime in the near future. The new whey storage system will allow the facility to separate good whey and unusable whey to increase the amount of whey waste that can be reused, and minimize the amount of whey waste that is discharged to the publically owned treatment works (POTW). It is recommended that the City follow up with the facility to learn more about the facility's extensive, solids-recovery-program planned upgrades to the whey storage tank. (Section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection)
16. A floor drain was located immediately downgradient of a battery charging station on the north side of the Saputo Dairy Foods USA facility. The facility representatives did not know if the floor drain had been plugged. Vehicles using the battery charging unit would

be positioned on or near the floor drain. Materials from the vehicles that may leak or spill would enter the floor drain. It is recommended that the City follow up with the facility to determine if the floor drain has been plugged. (Section 8.3, Nondomestic Discharger Site Inspections Conducted during the Inspection)

ICIS WENDB DATA ENTRY WORKSHEET

PRETREATMENT COMPLIANCE INSPECTIONS/AUDITS

► TYPE OF COMPLIANCE MONITORING: **PCI**► NAME OF PRETREATMENT PROGRAM: **City of Tulare**

► CONTROLLING AUTHORITY NPDES ID: Order No. R5-2013-0019

START DATE OF INSPECTION 1/8/2014

► END DATE OF INSPECTION 1/9/2014

LEAD INSPECTOR (Name, Company, Phone, E-mail [if available]):

Kettie Holland; PG Environmental

ACCOMPANYING INSPECTOR(s) (Name, Company, Phone, E-mail [if available]):

Danny O'Connell; PG Environmental

Anthony D'Angelo; PG Environmental

| SIGNIFICANT INDUSTRIAL USERS (SIUs) | PCI CHECKLIST REFERENCE | PCA CHECKLIST REFERENCE | DATA |
|---|-------------------------|----------------------------|------------|
| ► SIUs* : | II.B.2.a | I.C.4.a | 13 |
| ► SIUs Without Control Mechanism: | II.C.1.c | I.D.1 and II.A | 0 |
| ► SIUs Not Inspected: | II.E.2.c | I.F.2.c | 13 |
| ► SIUs Not Sampled: | II.E.2.b | I.F.2.b | 0 |
| ► SIUs in SNC with Pretreatment Standards** : | II.F.3.a | I.F.3.a | - |
| ► SIUs in SNC with Reporting Requirements: | II.F.3.a | I.F.3.a | - |
| SIUs in SNC with Pretreatment Schedule: | | I.F.3.a | 0 |
| SIUs in SNC Published in Newspaper: | | I.G.4; II.D.7 | - |
| Criminal Suits Filed Against SIUs: | II.F.1 | | 0 |
| CATEGORICAL INDUSTRIAL USERS (CIUs) | | | |
| ► CIUs: | | I.C.4.a | 0 |
| OTHER INFORMATION | | | |
| Pass-Through/Interference Indicator <i>(none, Yes, or No)</i> | | I.G.6 | No |
| DEFICIENCIES | | | |
| Control Mechanism Deficiencies <i>(No or Yes)</i> | | I.D.1;II.A.4 | Yes |
| Inadequacy of Sampling and Inspections <i>(No or Yes)</i> | | II.C and Site Visit Sheets | Yes |
| Adequacy of Pretreatment Resources <i>(Yes or No)</i> | | I.I | Yes |

FOOTNOTES:

► denotes required information

* The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."

** AS DEFINED IN EPA's 1986 Pretreatment Compliance Monitoring and Enforcement Guidance.

DATA ENTRY WORKSHEET
COMPLETED BY: **Kettie Holland**DATE: **3/20/2014**TITLE: **Environmental Scientist**TELEPHONE NO.: **303-279-1778**

RNC DATA ENTRY WORKSHEET

| RNC DATA ENTRY WORKSHEET | | | |
|--|--|--------------------------------|-----------------------|
| <i>INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.</i> | | | |
| CA name City of Tulare | | | |
| NPDES number Order No. R5-2013-0019 | | | |
| Date of inspection January 8-9, 2014 | | | Date entered into PCS |
| | | Level | Checklist Reference |
| NA | Failure to enforce against pass through and/or interference | I | II.F.6.b&9 |
| NA | Failure to submit required reports within 30 days | I | Att. A.A.3 |
| NA | Failure to meet compliance schedule milestone date within 90 days | I | Att. A.A.4 |
| NA | Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months | II | II.C.1.b&2 |
| Y | Failure to inspect or sample 80% of SIUs within the last 12 months | II | II.E.2 |
| NA | Failure to enforce pretreatment standards and reporting requirements | II | II.F.2 |
| NA | Other (specify) | II | |
| SNC | | | |
| NA | CA in SNC for violation of any Level I criterion | | |
| NA | CA in SNC for violation of two or more Level II criterion | | |
| <p>For more information on RNC, please refer to EPA's 1990 <u>Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements</u></p> | | | |
| RNC WORKSHEET COMPLETED BY: Kettie Holland | | DATE: 3/20/2014 | |
| TITLE: Environmental Scientist | | TELEPHONE: 303-279-1778 | |

K&M Truck Repair and Paint
Site Visit Data Sheet

SITE VISIT DATA SHEET

| | | | | | | |
|---|---------------------|---------------------|--------------------------|---|---------------------|-----------|
| INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible. | | | | | | |
| Name of Industry: K&M Truck Repair and Paint | | | | | | |
| Address of Industry: 1158 Martin Luther King Jr. Avenue; Tulare, CA 93274 | | | | | | |
| Date of visit: 01/09/2014 | | | Time of visit: 1:45 p.m. | | | |
| Name of inspector(s): Jim Polek, EPA Region 9 Kettie Holland, EPA Contractor, PG Environmental LLC | | | | | | |
| Provide the name(s) and title(s) of industry representative(s) | | | | | | |
| Name | | Title | | Phone/Email | | |
| Kevin Jordan | | Not reviewed (N/R). | | 559-686-3403 | | |
| | | | | | | |
| | | | | | | |
| IU Permit Number: N/R. | | Exp Date: N/R. | | IU Classification: Non-categorical significant industrial user (SIU). | | |
| Inspection | | Scheduled | X | Unscheduled | | PCA |
| Type/Purpose | X | PCI | | New Company | | Complaint |
| Please provide the following documentation: | | | | | | |
| 1. Nature of operation: The facility repaired and washed tanker trucks. The facility washed the inside of the tanks and the outside of the trucks, and occasionally performed painting on the trucks. The trucks are typically used for hauling dairy and food-grade products. The facility is classified as an SIU due to the volume and nature of the discharge generated at the facility. See note 1 in the Notes section for more information about the unscheduled inspection. | | | | | | |
| 2. | Number of employees | N/R. | Number of shifts: | N/R. | Hours of operation: | N/R. |
| 3. Water source: City of Tulare | | | | | | |
| 4. Wastestream flow(s) discharged to the POTW: The facility discharged pretreated wastewater from the truck washing operations to the sanitary sewer. The wash waters were treated in a three-stage oil and water separator before being discharged to the sanitary sewer. It should be noted that wash waters were observed flowing directly from a truck washing bay into a storm drain. See note 1 in the Notes section for further detail. | | | | | | |
| Sanitary: | | N/R. | Process: | N/R. | Combined: | N/R. |
| 5. Describe any significant changes in process or flow: There was no significant change in process or flow observed during the inspection. | | | | | | |
| 6. Type of pretreatment system (Describe): Wastewater from the truck wash flows into a three-stage oil and water separator before discharged to the sanitary sewer. | | | | | | |
| | Continuous flow | | | Batch | X | Combined |
| 7. Condition/operation of pretreatment system (Describe): Due to the nature of the inspection, the pretreatment system was not inspected as a component of the site visit. The facility contact stated that the oil and water separator is cleaned out on a monthly basis. | | | | | | |
| Any unusual conditions or problems with the pretreatment system: N/R. | | | | | | |
| 8. Process area description (identify raw materials and processes used): The facility had six truck bays and an office. The facility also had a boiler system for generating hot water for the truck washing process. The facility contact stated that the washing process for trucks typically takes 45 minutes. | | | | | | |
| 9. Condition/operation of process area (Describe): The truck washing bay was not in use at the time of the | | | | | | |

| | | | | |
|---|---|-----------------------------|-----|-----|
| inspection; however, the area was wet at the time of the site visit. Other truck bays were dry and were somewhat cluttered with tools and truck parts. | | | | |
| Any unusual conditions or problems with the process area: Wash waters from the truck washing bay were observed actively flowing into an offsite storm drain. See note 1 in the Notes section for further detail. | | | | |
| 10. General housekeeping in process area (Describe): The process areas briefly visited during the site inspection appeared to be relatively clean and somewhat cluttered. | | | | |
| Any unusual conditions or problems with general housekeeping in process area: There were no unusual conditions or problems with general housekeeping in the process area. | | | | |
| 11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): The facility had a tote of hydrogen peroxide and a tote of peracetic acid cleaner. There were also numerous paints stored at the facility. See note 3 in the Notes section for further detail. | | | | |
| Any floor drains? | Sewer connection. See note 3 in the Notes section for further detail. | Any spill control measures? | No. | |
| General housekeeping of chemical storage area (Describe): The chemicals at the facility were stored outside and partially uncovered behind the facility. The chemicals used for truck washing were stored in totes of approximately 275 gallons in the same area. One of the chemicals was an acidic solution and the other basic. These chemicals were stored close to a sanitary sewer connection and secondary containment was not provided. In addition, a hazardous waste storage drum lacked secondary containment and had an incomplete hazardous waste label. See note 3 in the Notes section for further detail. | | | | |
| 12. Are hazardous wastes drummed and labeled? Yes, but the labels were incomplete. See note 3 in the Notes section for further detail. | | | | |
| 13. Does the IU have hazardous waste manifests? This component was not reviewed as part of the inspection. | | | | |
| Any problems associated with hazardous waste: Yes, see note 3 in the Notes section for further detail. | | | | |
| 14. Solid waste production: This component was not reviewed as part of the inspection. | | | | |
| Solid waste disposal method(s): This component was not reviewed as part of the inspection. | | | | |
| 15. Description of sample location: This component was not reviewed as part of the inspection. | | | | |
| Sampling method/technique: This component was not reviewed as part of the inspection. | | | | |
| 16. Evaluation of self-monitoring data? | Yes | X | No | N/A |
| If yes, was self-monitoring adequate: Not applicable. | | | | |
| 17. Who performs the self-monitoring analysis? This component was not reviewed as part of the inspection. | | | | |
| Notes: | | | | |
| <p>1. In route to conduct a site inspection at the RUAN facility, the inspection team noticed wash waters actively flowing from the K&M Truck Repair facility into a nearby stormdrain. The stormdrain was located at the intersection of South Blackstone Street and Martin Luther King, Jr. Avenue, approximately 200 feet from the facility. The facility contact stated that it was a normal activity for some of the untreated wash waters from the truck washing bay to be discharged into the stormdrain.</p> <p>2. The stormwater observation was discussed with the City representative. It was recommended that the proper authorities be notified of the stormwater concern. After the inspection, the City representative stated that the City conducted an inspection at the facility the day after the inspection team's site visit. The City stated that the stormdrain the wash waters were draining into was vacuumed and cleaned.</p> | | | | |

3. During the inspection of the chemicals stored at the facility, it was observed that a tote of acidic solution and a tote of a basic solution were stored close to each other without secondary containment. This storage practice creates a potential safety hazard in the event of a leak or spill and subsequent mixture of solutions. In addition, the chemicals were stored without secondary containment near a drain which the facility contact stated led to the sanitary sewer system. Also, it was observed that a hazardous waste storage drum at the facility had a label but the hazardous waste accumulation start date had not been documented. Secondary containment was not provided for the hazardous waste drum. It is recommended that the City conduct a followup inspection to ensure that chemicals are properly stored in a manner that minimizes the potential for a slug discharge, spill, or other potential safety hazard.

Land O' Lakes
Site Visit Data Sheet

SITE VISIT DATA SHEET

| | | | | | | |
|--|---------------------|------------------------|---|---|------------------------------------|-----------|
| INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible. | | | | | | |
| Name of Industry: Land O'Lakes | | | | | | |
| Address of Industry: 400 South M Street; Tulare, CA 93274 | | | | | | |
| Date of visit: 01/09/2014 | | | Time of visit: 9:23 a.m. | | | |
| Name of inspector(s): Jim Polek, EPA Region 9 Kettie Holland, EPA Contractor, PG Environmental, LLC | | | | | | |
| Provide the name(s) and title(s) of industry representative(s) | | | | | | |
| Name | | Title | | Phone/Email | | |
| Douglas Findley | | Environmental Engineer | | 559-687-6653 | | |
| | | | | | | |
| | | | | | | |
| IU Permit Number: PTX-172 | | Exp Date: 06/30/2014 | | IU Classification: Non-categorical significant industrial user (SIU). | | |
| Inspection Type/Purpose | X | Scheduled | | Unscheduled | | PCA |
| | X | PCI | | New Company | | Complaint |
| Please provide the following documentation: | | | | | | |
| 1. Nature of operation: The facility manufactures dairy products such as dry milk and various butter products. The City has classified the facility as an SIU due to the nature and volume of discharge from the facility. | | | | | | |
| 2. Number of employees | Approximately 540 | Number of shifts: | 3, see note 1 in the Notes section for further detail. | Hours of operation: | 24 hours per day, 7 days per week. | |
| 3. Water source: The City of Tulare and onsite water wells | | | | | | |
| 4. Wastestream flow(s) discharged to the POTW: The facility discharges untreated pump seal water, boiler blowdown, reverse osmosis (RO) reject water, clean-in-place (CIP) wash waters and truck wash waters to the City's sanitary sewer. The facility contact stated that sometimes the CIP rinse water from the caustic step in the CIP process and the acidic wastewaters from the acid rinse step in the CIP process are mixed, in an effort to adjust the pH of the wastewater before discharging it to the sanitary sewer. Additionally, the facility produces "cow water" as a byproduct from removing the moisture when producing the dry milk product. The facility contact stated that sometimes the cow water is discharged to the sanitary sewer and sometimes it is used in the boiler and is ultimately discharged to the sanitary sewer as boiler blowdown. For more information on the CIP process, refer to note 5 in the Notes section. | | | | | | |
| Sanitary: | Not reviewed (N/R). | Process: | Approximately 1.6 million gallons per day (mgd). This value was recorded during the | Combined: | N/R. | |

| | | | | | |
|----|--|--|-------------|---|----------|
| | | | inspection. | | |
| 5. | Describe any significant changes in process or flow: There were no significant changes in process or flow observed during the time of the inspection. | | | | |
| 6. | Type of pretreatment system (Describe): The facility does not have a pretreatment system. See note 3 in the Notes section for further detail. | | | | |
| | Continuous flow | | Batch | X | Combined |
| 7. | Condition/operation of pretreatment system (Describe): The facility did not have a pretreatment system. Any unusual conditions or problems with the pretreatment system: Not applicable (N/A). | | | | |
| 8. | <p>Process area description (identify raw materials and processes used): The facility contact stated that approximately eight million pounds of milk is delivered to the facility per day. The raw milk enters the plant via tanker trucks and is weighed before being introduced into separators. The separators extract the fat from the milk, which is used for the butter production. The resulting non-fat milk is used in the dry milk production process. It should be noted that the inside of the main process area at the facility was not inspected due to the concern of product contamination. Refer to note 2 in the Notes section for further detail about the indoor process area.</p> <p>Since the inspection team did not review the inside of the facility, the outsides of multiple buildings were visited during the facility inspection. The interior of the evaporator building was also visited. The following observations were made regarding these areas:</p> <ul style="list-style-type: none"> • <u>Powder dryer 1</u>—The outside of this building was visited during the inspection. It should be noted that the facility had four powder drying buildings, each similar in operation. However, the most thorough inspection was conducted at powder dryer 1 due to construction activities around the other powder dryer buildings. At these buildings, water was removed from the milk product. This water is referred to as cow water and was either discharged to the sanitary sewer or used for the boiler operation. The cow water was introduced to an RO machine before being used as boiler water. The reject RO water was also discharged to the sanitary sewer from these buildings. A number of liquid chemicals were stored outside the powder dryer buildings. In addition, a conical tank in a bermed area with a drain was located outside of the powder dryer 1 building. This tank was used for the collection of “grit and grime” from the dry milk production process. The facility contact stated that once or twice per week the tank was “purged” to the drain, which leads to the sanitary sewer. See note 6 in the Notes section for further detail. • <u>Truck washing stations</u>—The facility had a number of truck washing stations that were located outside with overhead coverings. Here, the interiors of the dairy truck tanks were rinsed after the trucks delivered milk to the facility. • <u>Evaporator building</u>—This building housed the solid recovery evaporation tanks, a variety of chemicals, and capture tanks used for mixing the caustic and acidic wastewaters generated from the CIP process. The solid recovery evaporation tanks evaporated the liquids from the initial flushing of product in the first step of the CIP process. The solids were then hauled offsite. At the time of the inspection, one of the tanks was discharging a yellow-brown colored wastewater to the sanitary sewer. | | | | |
| 9. | Condition/operation of process area (Describe): The following conditions of the various process areas were observed during the inspection: | | | | |

- Powder dryer 1—The outside area of the building was relatively clean. Construction was taking place near this area at the time of the inspection.
- Truck washing stations—The truck wash stations were wet and free of debris during the time of the inspection.
- Evaporator building—This building was relatively cluttered due to the size of the tanks. There were a number of floor drains in the building. There was also staining on the floor. In addition, there were drains outside the building and it was unclear if the drains led to the sanitary system or stormwater system. See note 7 in the Notes section for further detail.

It should be noted that the main process area of the facility was not visited during the inspection. Refer to note 2 in the Notes section for further detail.

Any unusual conditions or problems with the process area: There were a number of chemicals at the facility that were not stored in secondary containment units. See note 4 in the Notes section for further detail.

10. General housekeeping in process area (Describe): The indoor process areas were not inspected as a component of the site visit. However, the following observations pertaining to housekeeping were made during the inspection:

- Powder dryer 1— The outside of this area was relatively clean and free of debris. As previously noted, the proximity of construction to the building caused some outside areas of the building not to be inspected.
- Truck washing stations—These stations were wet and free of debris. These areas were dispersed at different locations outside of the facility buildings.
- Evaporator building— This building was somewhat crowded but was relatively free of debris. There were stains on some areas of the floor.

Any unusual conditions or problems with general housekeeping in process area: There were no unusual conditions with the general housekeeping of the areas visited during the inspection.

11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): A number of different chemicals were stored onsite. During the site inspection it was determined that the facility had acid and alkaline solutions, octave (a sanitizer and disinfectant), caustic solution, foam-brite, and hypochlorite chemicals. Secondary containment was provided for some, but not all, of these chemicals. In addition, some of the secondary containment units provided for the chemicals were not adequate. For more information about the storage of these chemicals, refer to note 4 in the Notes section for further detail.

Any floor drains?

Sewer and/or storm drains.

Any spill control measures?

Yes. See note 4 in the Notes section for further detail.

General housekeeping of chemical storage area (Describe): The chemicals were stored at a variety of different locations around the facility. Refer to note 4 of the Notes section for more detail on how chemicals were stored at the facility.

12. Are hazardous wastes drummed and labeled? Hazardous waste drums were not observed on site.

13. Does the IU have hazardous waste manifests? This component was not reviewed as part of the inspection.

| | | | |
|--|--|-----|----|
| Any problems associated with hazardous waste: There were no issues associated with hazardous waste at the time of the inspection. However, there were concerns identified with chemical storage. See note 4 in the Notes section for further detail. | | | |
| 14. | Solid waste production: The facility produces solid waste in the form of off-spec product and residual solids from the evaporation process taking place at the solids recovery unit. | | |
| | Solid waste disposal method(s): Solid wastes are hauled offsite, either to a hog farm or to a landfill. | | |
| 15. | Description of sample location: The facility has a composite sampler inside a small metal shed, which is located near the intersection of West Sonoma Avenue and South I Street. | | |
| | Sampling method/technique: The facility permit states that grab and composite samples are to be collected at the facility. | | |
| 16. | Evaluation of self-monitoring data? | Yes | No |
| | If yes, was self-monitoring adequate: This component was not reviewed as part of the site inspection. | | |
| 17. | Who performs the self-monitoring analysis? This component was not reviewed as part of the site inspection. | | |
| Notes: | | | |
| <ol style="list-style-type: none"> The facility contact stated that the facility has the following operational shifts: <ul style="list-style-type: none"> 7:00 a.m. — 3:00 p.m. 3:00 p.m. — 11:00 p.m. 11:00 p.m. — 7:00 a.m. The site inspection mainly consisted of inspection of the outside of various dry milk production areas and the area housing capture tanks. The facility representative showed concern about the inspection team entering the main production area due to the possibility of product contamination. The facility contact stated that it has been a number of years since the City inspector had inspected the inside production area of the facility. The City is required to ensure that a thorough inspection of the facility's main production areas is performed to conduct surveillance activities in order to identify, independent of information supplied by the IU, occasional and continuing noncompliance with pretreatment standards in accordance to the federal regulations at 40 CFR 403.8(f)(2)(v). During the file review, prior to the site inspection, it was determined that the self-monitoring reports submitted to the City indicated a number of effluent violations for pH, electrical conductivity (EC), sodium, and oil and grease. During the site inspection, it was confirmed that the facility did not have a pretreatment system and was directly discharging the CIP waters to the sanitary sewer. The facility contact stated that the facility was looking into implementing a pretreatment system in order to reduce the number of effluent violations occurring at the facility. It is strongly recommended that the City work closely with the facility to ensure that the pretreatment system is adequate in treating the wastewater being discharged to the sanitary sewer and to be aware of any major changes in process and operation which may affect the characteristics of the wastewater being discharged from the facility. While inspecting the outsides of the process buildings, the inspection team observed a number of 55-gallon drums for which secondary containment units were not provided. In addition, there were chemicals stored on a secondary containment unit, but the containment unit was half full of what appeared to be rainwater. Therefore, if a spill were to occur, the secondary containment unit may not have the capacity to store the chemical. Furthermore, this secondary chemical storage unit and associated chemicals were stored on a sloped concrete ramp, which may increase the likelihood that a chemical spill cannot be contained. It is strongly recommended that the City conduct a followup inspection at the facility to ensure that chemicals are properly stored. | | | |

5. The facility contact stated that the following steps comprise the CIP process:
 - Product flush out—this step typically takes five minutes. The equipment used for the formulation of the dry milk and butter products is flushed with water as the initial step in the cleaning process. The wastewater from this process is sent to the solids recovery evaporator. From the evaporator, the solids are hauled offsite as animal feed and the extracted moisture is evaporated.
 - Balance tank with caustic—water and a caustic solution are added to the formulation tanks and equipment. This process takes approximately 30 minutes.
 - Flush—the tank and caustic solution are flushed.
 - Balance tank with acid—water and an acid solution are added to the formulation tanks and equipment. This process also takes approximately 30 minutes.
 - Flush—the tank and acid solution are flushed.
 - The facility contact stated that sometimes the wastewaters generated from the balance tank with caustic step and the balance tank with acid step are collected in a capture tank. These wastewaters are sometimes mixed in an effort to neutralize the pH of the wastewater before discharging it to the sanitary sewer.
6. During the inspection of the powder dryer 1 building. A conical tank was observed stored outside the facility in a bermed area with a drain. The facility contact stated that the conical tank was used for the storage of “grit and grime” generated as part of the dry milk production process. The facility contact also stated that this tank was purged one or two times per week depending upon production rates. According to the facility contact, the tank was purged, to the sanitary sewer. According to Section 2.D of the facility permit, “Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.” From the nature of the discharge described by the facility contact, it appeared that the solids and sludges from the conical tank were not being properly disposed of. It is also of concern that this type of discharge may cause a slug discharge or interfere with the collection system. Therefore, the City is required to ensure that the facility is properly disposing of wastes as stated in Section 2.D of the facility permit.
7. During the inspection, facility personnel appeared generally unaware of certain drain and pipe destinations. There were a number of drains located outside the facility that may have led to the storm drain or to the sanitary sewer system. In the event that drains outside lead to the sanitary sewer, there is concern that stormwater has the ability to be discharged to the sanitary sewer. In addition, if there are storm drains onsite that lead to a water body, it is of concern that non-stormwaters (truck wash waters) are being discharged to a nearby water body. It is strongly recommended that the City conduct a followup inspection to determine where these drains lead.

RUAN Transportation

Site Visit Data Sheet

SITE VISIT DATA SHEET

| | | | | | | |
|--|-------------------------------------|----------------------|--------------------------|---|--------------------------|--|
| INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible. | | | | | | |
| Name of Industry: RUAN Transportation | | | | | | |
| Address of Industry: 754 South Blackstone; Tulare, CA 93274 | | | | | | |
| Date of visit: 01/09/2014 | | | Time of visit: 1:15 p.m. | | | |
| Name of inspector(s): Jim Polek, EPA Region 9 Kettie Holland, EPA Contractor, PG Environmental, LLC | | | | | | |
| Provide the name(s) and title(s) of industry representative(s) | | | | | | |
| Name | | Title | | Phone/Email | | |
| Ed Rodriguez | | Parts Manager | | 559-686-1645 | | |
| | | | | | | |
| | | | | | | |
| IU Permit Number: PTX-163 | | Exp Date: 06/30/2014 | | IU Classification: Non-categorical significant industrial user (SIU). | | |
| Inspection | <input checked="" type="checkbox"/> | Scheduled | <input type="checkbox"/> | Unscheduled | <input type="checkbox"/> | PCA |
| Type/Purpose | <input checked="" type="checkbox"/> | PCI | <input type="checkbox"/> | New Company | <input type="checkbox"/> | Complaint |
| Please provide the following documentation: | | | | | | |
| 1. Nature of operation: The facility is a truck maintenance shop that washes and repairs large hauling and tanker trucks. Wastewater generated from a parts washing machine at the facility was hauled offsite for proper disposal. The facility is classified as an SIU due to the nature of wastewater generated at the facility. | | | | | | |
| 2. | Number of employees | Approximately 14 | Number of shifts: | Three 8-hour shifts | Hours of operation: | 24 hours per day, seven days per week. |
| 3. Water source: City of Tulare | | | | | | |
| 4. Wastestream flow(s) discharged to the POTW: The facility discharges wastewater from its truck washing operations to the sanitary sewer. It should be noted that the facility only washes the outside of the tanker trucks. | | | | | | |
| Sanitary: | Not reviewed (N/R). | Process: | N/R. | Combined: | N/R. | |
| 5. Describe any significant changes in process or flow: There were no significant changes in process or flow observed during the time of the inspection. | | | | | | |
| 6. Type of pretreatment system (Describe): The facility does not have a pretreatment system. | | | | | | |
| | Continuous flow | | Batch | <input checked="" type="checkbox"/> | Combined | |
| 7. Condition/operation of pretreatment system (Describe): The facility does not have a pretreatment system. Any unusual conditions or problems with the pretreatment system: Not applicable (N/A). | | | | | | |
| 8. Process area description (identify raw materials and processes used): The facility had 12 truck bays and an office area in the middle of the building. Some of the bays were used for truck washing and others were used as areas to perform repairs on trucks. The facility also had rooms for storing truck parts, tires, and used oil. | | | | | | |
| 9. Condition/operation of process area (Describe): The truck washing and maintenance areas were relatively clean and free of debris. The tanker trucks occupied most of the space in the bays. | | | | | | |
| Any unusual conditions or problems with the process area: There were no unusual conditions or problems observed with the process area during the time of the inspection. | | | | | | |

| | | | | |
|---|---|-----------------------------|------|-----|
| 10. General housekeeping in process area (Describe): The process areas visited during the inspection were relatively clean and free of debris. The truck bays used for maintenance activities were cluttered due to the presence of tools, trucks, and truck parts. The bays used for truck washing were wet and free of debris. The areas used for the storage of tires, parts, and used oil were cluttered. | | | | |
| Any unusual conditions or problems with general housekeeping in process area: There were numerous locations throughout the facility where used oil was stored before being transported to the large used oil tank. See note 2 in the Notes section for further detail. | | | | |
| 11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): The facility had numerous large chemical totes that were stored at different areas. These consisted of a 500-gallon, double-walled tank of used oil, a 300-gallon tank housing antifreeze, a 330-gallon tote of soap, and approximately 55 gallons of pro-spray clean soap. | | | | |
| Any floor drains? | Yes. Soap was stored in truck washing area. | Any spill control measures? | Yes. | |
| General housekeeping of chemical storage area (Describe): The chemicals were stored at a number of different locations throughout the facility. The antifreeze tank was stored outside, near one of the truck bays, and the used oil tank was stored inside, near the tire storage area. The chemicals were labeled and spill containment measures were provided. | | | | |
| 12. Are hazardous wastes drummed and labeled? N/A. | | | | |
| 13. Does the IU have hazardous waste manifests? Yes, see note 1 in the Notes section for further detail. | | | | |
| Any problems associated with hazardous waste: A chemical labeling deficiency was identified at the facility. Refer to note 2 in the Notes section for further detail. | | | | |
| 14. Solid waste production: This component was not reviewed as part of the inspection. | | | | |
| Solid waste disposal method(s): This component was not reviewed as part of the inspection. | | | | |
| 15. Description of sample location: A composite sampler was located inside the facility near a truck washing bay. | | | | |
| Sampling method/technique: The permit requires that grab and composite samples be collected at the facility. | | | | |
| 16. Evaluation of self-monitoring data? | Yes | X | No | N/A |
| If yes, was self-monitoring adequate: This component was not reviewed as part of the inspection. | | | | |
| 17. Who performs the self-monitoring analysis? This component was not reviewed as part of the inspection. | | | | |
| Notes: | | | | |
| 1. The EPA inspection team reviewed a waste manifest in which 250 gallons of non-RCRA (Resource Conservation and Recovery Act) hazardous waste liquid (used oil) was hauled offsite on January 8, 2014. | | | | |
| 2. During the inspection of a bay where waste oil was collected, a number of used oil containers that were not labeled were observed in the used oil storage areas. It is strongly recommended that the City ensure that chemicals stored at the SIU facilities are properly labeled. | | | | |
| 3. It should be noted that the City inspector notified the facility contact that the EPA inspectors were planning to conduct an inspection at the facility. The City inspector did not accompany the EPA inspection team to the facility due to the fact that the inspector was using crutches, which may have posed a safety risk. | | | | |
| 4. The facility's permit states that its flow allowance is 7,806 gallons per day. It should be noted that the facility wash discharging truck wash waters at the time of the site inspection. | | | | |

Saputo Dairy Foods USA

Site Visit Data Sheet

SITE VISIT DATA SHEET

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|---|-------------------------------------|-----------------------|--------------------------------|---|--------------------------------|-----------|
| INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible. | | | | | | |
| Name of Industry: Saputo Dairy Foods USA | | | | | | |
| Address of Industry: 605 North J Street; Tulare, CA 93274 | | | | | | |
| Date of visit: 01/09/2014 | | | Time of visit: 9:15 a.m. | | | |
| Name of inspector(s): Danny O'Connell, EPA Contractor, PG Environmental, LLC Anthony D'Angelo, EPA Contractor, PG Environmental, LLC Anthony Toto, Central Valley Regional Water Quality Control Board | | | | | | |
| See note 1 of the Notes section of this report for additional details regarding the inspection. | | | | | | |
| Provide the name(s) and title(s) of industry representative(s) | | | | | | |
| Name | | Title | | Phone/Email | | |
| Michael "Buck" Buchanan | | Plant Manager | | 559-686-2876 x36044 buck.buchanan@saputo.com | | |
| Carrol Dugan | | Environmental Manager | | 562-862-7686 x377 cdugan@saputo.com | | |
| IU Permit Number: PTX-321 | | Exp Date: 06/30/2014 | | IU Classification: Non-categorical significant industrial user (SIU). | | |
| Inspection | <input checked="" type="checkbox"/> | Scheduled | <input type="checkbox"/> | Unscheduled | <input type="checkbox"/> | PCA |
| Type/Purpose | <input checked="" type="checkbox"/> | PCI | <input type="checkbox"/> | New Company | <input type="checkbox"/> | Complaint |
| Please provide the following documentation: | | | | | | |
| 1. Nature of operation: The facility manufactured and shipped cultured dairy products, such as sour cream and cottage cheese, utilizing homogenization, pasteurizations, blending, and packaging. The City has classified the facility as an SIU due to the nature and volume of discharge from the facility. | | | | | | |
| 2. Number of employees | Approximately 90 | Number of shifts: | 3 | Hours of operation: | 24 hours, seven days per week. | |
| 3. Water source: The facility's water is provided by the City of Tulare and onsite water wells. See note 2 of the Notes section of this report for additional details. | | | | | | |
| 4. Wastestream flow(s) discharged to the POTW: The facility discharged cheese curd cooling water, reverse osmosis (RO) reject water, and clean-in-place (CIP) wash waters to the City's sanitary sewer. | | | | | | |
| Sanitary: | Not reviewed (N/R). | Process: | 300,000 gallons per day (gpd). | Combined: | N/R. | |
| 5. Describe any significant changes in process or flow: There were no significant changes in process or flow observed during the time of the inspection; however, the facility was developing plans to upgrade the whey storage tank. See note 3 of the Notes section of this report for additional details. | | | | | | |
| 6. Type of pretreatment system (Describe): Sanitation wastewaters from the facility's CIP processes flow to floor drains in the process rooms; the floor drains flow to various sumps. Solids are screened from the wastewaters that accumulate in the sumps. The screened wastewaters are pumped to a treatment tank, where the pH is adjusted using aqueous ammonia. Treated wastewater is then discharged to the sanitary sewer. | | | | | | |
| See note 4 of the Notes section of this report for additional details. | | | | | | |

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| NOTE: The pretreatment system is reported as it was observed during this inspection. | | | |
| X | Continuous flow | Batch | Combined |
| 7. | Condition/operation of pretreatment system (Describe): The pretreatment system appeared to be operating adequately; no signs of operational or compliance issues were identified during the inspection. | | |
| | Any unusual conditions or problems with the pretreatment system: There were no unusual conditions or problems observed at the pretreatment system. | | |
| 8. | <p>Process area description (identify raw materials and processes used): Raw milk product was pumped to two 40,000-gallon milk silos and four 6,000-gallon cream silos. Raw product was blended using three 3,000-gallon blend tanks. Whey and curd was separated from the raw milk and the curd was used for the production of various grades of sour cream and cottage cheese. Whey collected from the curd separation process, as well as whey collected from rinse waters, was pumped to an 18,000-gallon wastewater storage tank and hauled offsite for animal feed. The separated cheese curd was cooled in a cooling tower and stored in seven hydro silos. Each hydro silo was equipped with an electric conductivity (EC) meter. All cooling water from the curd cooling process and rinse water from the hydro silos was pumped to the RO unit.</p> <p>The facility operated two CIP systems, one for the pasteurization system and one for the raw product processing system. In addition, wash tanks containing CIP cleaning solution were used to sanitize equipment from the cottage cheese and sour cream production lines. All CIP wash waters were collected in various sumps and pumped to the pretreatment unit. CIP standard operating procedures for the different process areas were maintained at the facility and made available for review. The facility conducted CIP cycles of all facility equipment using caustic solution and sanitizing agents every 24 hours. Once a month, the facility conducted an acid wash of all product tanks. Chemical agent concentration checks were conducted for each wash cycle, and all CIP events and concentrations used were logged. Every Saturday, the facility conducted a wet cleanup of all the facility floors using CIP solution. During this process, solids screens were put over all floor drains to prevent any solids from being flushed to the pretreatment system.</p> | | |
| 9. | Condition/operation of process area (Describe): The process areas were designed for the efficient and sterile production of cheese products. | | |
| | Any unusual conditions or problems with the process area: Yes. See note 5 of the Notes section of this report for additional details. | | |
| 10. | General housekeeping in process area (Describe): The process areas were wet in certain spots but were clean and free of clutter. | | |
| | Any unusual conditions or problems with general housekeeping in process area: There were no unusual conditions with the general housekeeping of the areas visited during the inspection. | | |
| 11. | Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): A 330-gallon tote of potassium sorbate used to increase the shelf life of sour cream was maintained in the sour cream production area. Various CIP solutions and sanitizing agents were observed throughout the facility in containment pallets. | | |
| | Any floor drains? | Yes. | Any spill control measures? Yes, secondary containment was provided for all totes and drums of chemicals. |
| | General housekeeping of chemical storage area (Describe): The chemical storage area was clean and well organized. | | |
| 12. | Are hazardous wastes drummed and labeled? This component was not reviewed as part of the inspection. | | |
| 13. | Does the IU have hazardous waste manifests? This component was not reviewed as part of the | | |

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| inspection. | | | | | |
| Any problems associated with hazardous waste: This component was not reviewed as part of the inspection. | | | | | |
| 14. Solid waste production: The facility produced waste whey product, which was hauled offsite and used for animal feed. | | | | | |
| Solid waste disposal method(s): Hauled offsite and used for animal feed. | | | | | |
| 15. Description of sample location: Sewer room with composite sampler located in the southwest corner of the facility. See note 6 of the Notes section for additional details. | | | | | |
| Sampling method/technique: The facility's permit specifies that both composite and grab samples be collected from the facility. | | | | | |
| 16. Evaluation of self-monitoring data? | | Yes | X | No | N/A |
| If yes, was self-monitoring adequate: This component was not reviewed as part of the inspection. | | | | | |
| 17. Who performs the self-monitoring analysis? Sierra Dairy Laboratories | | | | | |
| Notes: | | | | | |
| <ol style="list-style-type: none"> 1. The City's wastewater inspector did not accompany the EPA inspection team during the facility inspection due to an injury that inhibited his ability to safely maneuver around the facility. The City's wastewater inspector informed the facility by phone of the inspection prior to the EPA inspection team arriving on site. 2. The facility representatives explained that the facility typically operates on well water but has the ability to pull water from the City if needed. At the time of the inspection, the facility was using City water due to scheduled maintenance occurring on the facility's well. 3. The facility was in the process of upgrading the whey storage tank. At the time of the inspection, the facility was using an 18,000-gallon tank to store whey wastewater that is waiting to be hauled offsite. The facility representatives stated that the facility was planning to upgrade to a 25,000-gallon whey waste storage tank sometime in the near future. The new whey storage system will allow the facility to separate good whey and unusable whey to increase the amount of whey waste that can be reused, and minimize the amount of whey waste that is discharged to the publically owned treatment works (POTW). It is recommended that the City follow up with the facility to learn more about the facility's extensive, solids-recovery-program planned upgrades to the whey storage tank. 4. Cooling and rinse waters from the curd tanks are pumped to a reverse osmosis (RO) unit. Solids are screened from the wastewater prior to its entering the RO unit to prevent blinding the system. Effluent from the RO unit is reused in the facility's processes. RO reject stream is pumped to the treatment tank and discharged to the sanitary sewer. 5. A floor drain was located immediately downgradient of a battery charging station on the north side of the facility. The facility representatives did not know if the floor drain had been plugged. Vehicles using the battery charging unit would be positioned on or near the floor drain. Materials from the vehicles that may leak or spill would enter the floor drain. It is recommended that the City follow up with the facility to determine if the floor drain has been plugged. 6. The water softener system at the facility was being serviced by a contractor at the time of the inspection. 7. The facility's calibration log was located in the sewer room. All probes located at the facility's discharge | | | | | |

point were last calibrated on 12/28/13.

8. The facility was currently conducting an EC monitoring program with the University of California Davis in order to identify and reduce salt levels of the facility's curd cooling water. The facility added an EC meter, which is calibrated monthly, to the cooling tower. It should be noted that CIP wash waters are not passed through the EC meter.

Tranter, Inc.

Site Visit Data Sheet

SITE VISIT DATA SHEET

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|--|---|-------------------------------------|---------------------------|---|---------------------|---|
| INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible. | | | | | | |
| Name of Industry: Tranter, Inc. | | | | | | |
| Address of Industry: 857 East Levin Avenue; Tulare, CA 93274 | | | | | | |
| Date of visit: 01/09/2014 | | | Time of visit: 1:20 p.m. | | | |
| Name of inspector(s): Danny O'Connell, EPA Contractor, PG Environmental, LLC Anthony D'Angelo, EPA Contractor, PG Environmental, LLC Anthony Toto, Central Valley Regional Water Quality Control Board | | | | | | |
| See note 1 of the Notes section of this report for additional details regarding the inspection. | | | | | | |
| Provide the name(s) and title(s) of industry representative(s) | | | | | | |
| Name | | Title | | Phone/Email | | |
| Stan Stone | | West Coast Operation Manager | | 559-686-1840 sstone@tranter.com | | |
| Erica Stephenson | | West Coast Inside Sales and Service | | 559-686-1840 estephenson@tranter.com | | |
| | | | | | | |
| IU Permit Number: PTX-454 | | Exp Date: 06/30/2014 | | IU Classification: Non-categorical significant industrial user (SIU). See note 2 of the Notes section of this report for additional details regarding the inspection. | | |
| Inspection Type/Purpose | X | Scheduled | | Unscheduled | | PCA |
| | X | PCI | | New Company | | Complaint |
| Please provide the following documentation: | | | | | | |
| 1. Nature of operation: The facility performed servicing and cleaning of heat transfer unit contact plates. The facility representative stated that the facility received used heat transfer contact plates from various customers, including the petroleum, citrus, and dairy industries. The facility representative explained that the heat transfer contact plates must be cleaned periodically to remove any accumulated material and residuals. Plate cleaning entailed a caustic solution wash, an acid solution wash, a static rinse (i.e., dead rinse), and power washing. Plate servicing entailed conducting a black light dye test to ensure plate integrity and replacing the plate gasket. | | | | | | |
| 2. | Number of employees | 7 | Number of shifts: | 1 | Hours of operation: | 8:00 a.m. – 4:30 p.m., 5 days per week. |
| 3. | Water source: City of Tulare | | | | | |
| 4. | Wastestream flow(s) discharged to the POTW: The facility discharged treated wastewaters from its contact plate power washing and dye rinsing activities; the pretreated wastewaters were collected and stored in a 2,100-gallon storage tank, located outside. Overflow wash and rinse waters from the chemical tank containment area were collected in a floor drain within the containment area and were piped to the outside, 2,100-gallon wastewater storage tank. The facility performed a weekly batch discharge event of approximately 300–700 gallons from the outdoor wastewater storage tank. | | | | | |
| Rinse water from the static rinse tank (i.e., dead rinse) is not discharged to the sanitary sewer. | | | | | | |
| Sanitary: | Not reviewed (N/R). | Process: | 300–700 gallons per week. | Combined: | N/R. | |

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| 5. | Describe any significant changes in process or flow: No significant changes in process or flow were reported or observed at the time of the inspection. | | | |
| 6. | Type of pretreatment system (Describe): The facility filters wastewater generated from the power washing by a 50-micron fabric filter prior to the water's entering the 2,100-gallon wastewater storage tank, located outside the facility. Wastewater from the 2,100-gallon storage tank is sent through a wastewater interceptor prior to discharging into the City's sanitary sewer system. See note 3 of the Notes section for additional details regarding the facility's wastewater interceptor. | | | |
| | NOTE: The pretreatment system is reported as it was observed during this inspection. | | | |
| | Continuous flow | X | Batch | Combined |
| 7. | Condition/operation of pretreatment system (Describe): The pretreatment system appeared to be operating properly at the time of the inspection. | | | |
| | Any unusual conditions or problems with the pretreatment system: There were no unusual conditions or problems observed with the pretreatment system during the time of the inspection. | | | |
| 8. | Process area description (identify raw materials and processes used): The inspection team visited two process areas at the facility: | | | |
| | <ul style="list-style-type: none"> • <u>Chemical tank containment area</u> – This area of the facility was used for cleaning the heat transfer unit plates by passing them through a series of acid, caustic, and static (i.e., dead) rinse tanks. Multiple plates were loaded onto a rack and dipped in the different tanks by an overhead mechanical crane system. The facility representative explained that the plates were first dipped into a heated caustic solution tank, which contained a 20 percent solution of sodium hydroxide. The plates were then dipped into a non-heated static (i.e., dead) rinse tank prior to being dipped into a heated acid solution tank, which contained a 20 percent solution of phosphoric acid. After the acid tank, the plates were dipped again into the non-heated static rinse tank. After each dip, the “drag out” is allowed to drain over the respective tank to prevent chemistry from mixing. • <u>Power wash/dye check area</u> – In this area of the facility, the plates were power washed to remove excess material remaining after the chemical cleaning process. Power washing occurred within a concrete-bermed area of the facility and the wash water was collected in a floor drain. Detergents were not used in the power washing process. Once the plates had been power washed, they were coated with a fluorescent dye in an adjacent bermed area of the facility and inspected using a black light for additional material deposits, cracks, or other integrity issues. Once the plates had been inspected, the dye was rinsed off and new gaskets were installed on the plates. | | | |
| 9. | Condition/operation of process area (Describe): During the inspection of the power wash/dye check area, a crack in the concrete berm was observed. Further, rinse water was observed on the facility floor, outside of the bermed area. See note 4 of the Notes section of this report for additional details regarding the power wash/dye check, concrete-bermed area. | | | |
| | Any unusual conditions or problems with the process area: A small volume of what appeared to be rinse water was on the floor outside of the process containment areas. | | | |
| 10. | General housekeeping in process area (Describe): The chemical tank containment area was located within a concrete secondary containment wall. The power wash/dye check area was located within a concrete berm. Both process areas were relatively clean and free of debris. The power wash/dye check area was wet due to dye rinsing activities occurring during the inspection. | | | |
| | Any unusual conditions or problems with general housekeeping in process area: See note 4 of the Notes section for additional details regarding the power wash/dye check, concrete-bermed area. | | | |

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| <p>11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): During the inspection, 55-gallon drums of sodium hydroxide and a 275-gallon tank of phosphoric acid were observed stored within the concrete secondary containment area of the chemical tank containment area. See note 5 of the Notes section of this report for additional details.</p> <p>Additional 55-gallon drums of acetone and miscellaneous chemicals were stored on secondary containment pallets in the corner of the facility near the chemical tank containment area.</p> | | | | | |
| Any floor drains? | | Yes. See note 5 of the Notes section of this report for additional details. | | Any spill control measures? | |
| | | | | Yes, secondary containment pallets were used for chemicals that were stored outside of the chemical tank containment area. | |
| <p>General housekeeping of chemical storage area (Describe): The chemical storage areas were clean and free of debris at the time of the inspection. The chemical tank containment area, used to store the sodium hydroxide and phosphoric acid, was wet in areas due to previous cleaning activities occurring within the chemical tank containment area.</p> | | | | | |
| 12. Are hazardous wastes drummed and labeled? N/R. | | | | | |
| 13. Does the IU have hazardous waste manifests? N/R. | | | | | |
| Any problems associated with hazardous waste: N/R. | | | | | |
| 14. Solid waste production: Solid residuals from the plates that accumulate in the tanks. | | | | | |
| Solid waste disposal method(s): Solid waste is hauled offsite for proper disposal. The inspection team did not review waste manifests during the inspection. | | | | | |
| 15. Description of sample location: Facility personnel check the pH of the wastewater by collecting samples from a sample port located outside, at the 2,100-gallon wastewater tank storage, upstream of the facility's wastewater interceptor. Self-monitoring samples are collected from a manhole located downstream of the interceptor. See note 6 of the Notes section for additional details regarding sampling locations. | | | | | |
| Sampling method/technique: The facility's permit specifies that both grab and 24-hour flow composite samples are to be collected. | | | | | |
| 16. Evaluation of self-monitoring data? | | Yes | X | No | N/A |
| If yes, was self-monitoring adequate: N/R. | | | | | |
| 17. Who performs the self-monitoring analysis? N/R. | | | | | |
| Notes: | | | | | |
| <p>1. The City's wastewater inspector did not accompany the inspection team during the facility inspection due to an injury that inhibited his ability to safely maneuver around the facility. The City's wastewater inspector informed the facility by phone of the inspection prior to the EPA inspection team arriving on site.</p> <p>2. The City had previously classified the facility as a non-categorical significant industrial user (SIU). The inspection team expressed concern to the City regarding the classification of the facility due to the use of acids and caustics in the metal plate washing process. The facility representative stated that the removal of metal from the plates by the acid and caustic washes is not the intended purpose of the washing process. However, due to the removal of metals during the metal plate washing process, the facility's metal plate washing process is regulated under 40 CFR 433. Therefore, the City is required to apply the correct categorical classification to the facility as required by 40 CFR 403.8(f)(2)(iii).</p> | | | | | |

3. The facility maintains a wastewater interceptor located outside, between the 2,100-gallon wastewater storage tank and the facility's discharge location to the City's sanitary sewer. The facility representative stated that the interceptor was cleaned approximately 6–8 months prior to the inspection.
4. The power wash/dye check area at the facility was contained by a concrete berm. The area was split into two sub-areas, dye check area and power wash area, by a concrete berm. Each sub-area contained a separate floor drain that was connected to the outside, 2,100-gallon wastewater storage tank. A crack was observed in the concrete berm of the power wash sub-area and wash water was observed on the facility floor, outside of the bermed area.
5. A floor drain was located in the corner of the chemical tank containment area. The floor drain valve was closed at the time of the inspection and can only be opened manually. The facility maintains a critical control point analysis plan onsite which identified the chemical tank containment area as critical control point (CCP) 1.
6. The City wastewater inspector was not present during the facility inspection; therefore, the location at which the City collects samples was not verified while the inspection team was onsite. The facility representative stated that he believed the City's wastewater inspector collects samples from a manhole located downstream of the facility's interceptor. The facility representative stated that the pH of the wastewater is checked using wastewater samples collected from a sample port located outside at the 2,100-gallon wastewater tank storage tank. However, self-monitoring samples are collected from a manhole located downstream of the facility's interceptor, the same place where the City collects its samples.